# 4.4 Cultural Resources

## 4.4.1 Introduction

This section of the EIR evaluates the potential impacts to cultural resources that could result from future development within the Project site. Mitigation measures to avoid or reduce adverse impacts are identified, as appropriate.

# 4.4.2 Environmental Setting

## 4.4.2.1 Regulatory Framework

Cultural resources are typically buildings, sites, structures, objects, or districts, each of which may have historical, architectural, archaeological, cultural, or scientific importance. Numerous laws, regulations, and statutes at both the federal and state levels seek to protect and target the management of cultural resources.

## 4.4.2.1.1 <u>Federal</u>

# **Historic Sites Act (1935)**

The Historic Sites Act, regulated in 16 United States Code (USC) 461 et seq., declares a national policy to preserve historic sites, buildings, antiquities, and objects of national significance, including those located on refuges. The Historic Sites Act provides procedures for designation, acquisition, administration, and protection of such sites.

# National Historic Preservation Act, as Amended (1966)

The National Historic Preservation Act (NHPA) declares federal policy to protect historic sites and values in cooperation with other nations, states, and local governments. The NHPA establishes a program of grants to assist states with historic preservation activities. Subsequent amendments designated the State Historic Preservation Officer (SHPO) as the individual responsible for administering state-level programs. The NHPA also created the President's Advisory Council on Historic Preservation (ACHP). Federal agencies are required to consider the effects of their undertakings on historic properties, and to give the ACHP a reasonable opportunity to comment on those undertakings. A lead federal agency will be responsible for project compliance with NHPA Section 106 and its implementing regulations, set forth by the ACHP in 36 Code of Federal Regulations (CFR) Section 800.

# **Archaeological and Historic Preservation Act (1974)**

Under 16 USC 469-469c, the Archaeological and Historic Preservation Act (AHPA) requires federal agencies to provide notice to the Secretary of the Interior of any alteration of the terrain caused as a result of any federal construction project or federally licensed activity or program. If archaeological resources are found, the AHPA requires federal agencies to provide for their recovery or salvage. The law applies to any agency whenever it receives information that a direct or federally assisted activity could cause irreparable harm to prehistoric, historic, or archaeological data. Up to one percent of project funds can be used to pay for salvage work. The AHPA also authorizes additional funding to be made available for this purpose.

## American Indian Religious Freedom Act (1978)

The American Indian Religious Freedom Act (AIRFA), 42 USC 1996, et seq., regulated under 43 CFR Section 7, has been established to protect religious practices, ethnic heritage sites, and land uses of Native Americans. The AIRFA makes it a policy to protect and preserve for Native Americans, Eskimos, Aleuts, and Native Hawaiians their inherent right of freedom to believe, express, and exercise their traditional religions. The AIRFA allows them access to sites, use, and possession of sacred objects, and freedom to worship through ceremonial and traditional rights. It further directs various federal departments, agencies, and other instrumentalities responsible for administering relevant laws to evaluate their policies and procedures in consultation with Native American traditional religious leaders to determine changes necessary to protect and preserve Native American cultural and religious practices.

## **Archaeological Resources Protection Act (1979)**

The Archaeological Resources Protection Act (ARPA) supplements the provisions of the Antiquities Act of 1906, and declares it illegal to excavate or remove from federal or Native American lands any archaeological resources without a permit from the land manager (or federal agency with jurisdiction over those lands). Permits may be issued only to educational or scientific institutions, and only if the resulting activities will increase knowledge about archaeological resources. Major penalties for violating the law are included. Regulations found at 43 CFR Section 7 state that the ultimate disposition of materials recovered as a result of permitted activities excavated from public lands remains the property of the United States. Those excavated from Native American lands remain the property of the Native American or Native American tribe having rights of ownership over such resources.

## **Native American Graves Protection and Repatriation Act (1990)**

The Native American Graves Protection and Repatriation Act (NAGPRA), 25 USC 3001 et seq., defines cultural items, sacred objects, and objects of cultural patrimony, and establishes ownership hierarchy for remains found on federal lands. It also provides for specific case review, allows excavation of human remains, and stipulates return of the remains according to ownership. NAGPRA also sets penalties for violations of NAGPRA, calls for cultural resource inventories, and has provisions for the return of specified cultural items to the appropriate Native American tribe(s) and/or Native Hawaiian organization(s). NAGPRA is initiated when the project and the finds are situated on federal lands.

# 4.4.2.1.2 State

In California, cultural resources include archaeological and historical objects, sites, and districts; historic buildings and structures; cultural landscapes; and sites and resources of concern to local Native American and other ethnic groups. Compliance procedures are set forth in CEQA and California Public Resources Code (PRC) §§15064.5 and 15126.4. The applicable state laws and codes are presented below.

# California Native American Graves Protection and Repatriation Act (2001)

In the California Health and Safety Code, Division 7, Part 2, Chapter 5 (§§8010-8030), broad provisions are made for the protection of Native American cultural resources. The California Native American Graves Protection and Repatriation Act sets the state policy to ensure that all

California Native American human remains and cultural items are treated with due respect and dignity. The California Native American Graves Protection and Repatriation Act also provides the mechanism for disclosure and return of human remains and cultural items held by publicly funded agencies and museums in California. Likewise, the California Native American Graves Protection and Repatriation Act outlines the mechanisms by which California Native American tribes not recognized by the federal government may file claims to human remains and cultural items held in agencies or museums.

#### **State Historical Resources Commission**

California PRC §5020 created the California Historic Landmarks Committee in 1939, which authorizes the California Department of Parks and Recreation to designate Registered Historical Landmarks and Registered Points of Historical Interest.

#### Substantial Adverse Change of a Historical Resource

Under CEQA Section 21084, historical resources as defined in subdivision (k) of Section 4020.1, and included as such in a local register, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resource may be a historical resource.

# <u>Determining the Significance of Impacts to Archaeological and Historical Resources</u>

Under California Environmental Quality Act, 15064.5, for the purposes of this report, a resource shall be considered to be historically significant if it meets the criteria for listing on the CRHR (Public Resources Code [PRC] 5024.1, Title 14 California Code of Regulations, Section 4852), including the following:

- It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- It is associated with the lives of persons important in our past.
- It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- It has yielded, or may be likely to yield, important information in prehistory or history.

A significant effect on a cultural resource is defined as:

- A substantial adverse change in the significance of a historical resource by physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings.
- A change that demolishes or materially alters those physical characteristics of a historical resource that convey its significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR, or inclusion in a local register.

#### <u>California Register of Historical Resources</u>

In 1992, the California Legislature established the CRHR. The CRHR is used as a guide by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from substantial adverse change. The CRHR, as instituted by the PRC, automatically includes all California properties already listed in the National Register of Historic Places (NRHP) and those formally determined to be eligible for the NRHP (Categories 1 and 2 in the State Inventory of Historical Resources), as well as specific listings of California Historical Landmarks (CHLs) and California Points of Historical Interest (CPHIs). The CRHR also may include various other types of historical resources that meet the criteria for eligibility, including the following:

- Individual historical resources.
- Resources that contribute to a historic district.
- Resources identified as significant in historic resource surveys.

Resources with a significance rating of Category 3 through Category 5 in the State Inventory (Categories 3 and 4 refer to potential eligibility for the NRHP; Category 5 indicates a property with local significance).

A property must meet at least one of the following criteria to be eligible for inclusion in the CRHR:

- It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- It is associated with the lives of persons important in our past.
- It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- It has yielded, or may be likely to yield, information important in prehistory or history.

# Native American Historical, Cultural, and Sacred Sites

Procedures are detailed under California PRC §5097.9 for actions taken whenever Native American remains are discovered. California PRC §5097.9 stipulates that no public agency, and no private party using or occupying public property, or operating on public property, under a public license, permit, grant, lease, or contract made on or after July 1, 1977, shall in any manner whatsoever interfere with the free expression or exercise of Native American religion as provided in the U.S. Constitution and the California Constitution; nor shall any such agency or party cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine located on public property, except on a clear and convincing showing that the public interest and necessity so require. The California Native American Heritage Commission (NAHC), pursuant to §§5097.94 and 5097.97, shall enforce the provisions of this chapter.

#### **Disturbance of Human Remains**

Under California Health and Safety Code §7050.5, every person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery, without authority of law, is guilty of a misdemeanor, except as provided in California PRC §5097.99. In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent remains, until the coroner of the county in which the human remains are discovered has determined the remains to be archaeological. If the coroner determines that the remains are not subject to his or her authority, and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC.

#### **Removal of Human Remains**

Under California Health and Safety Code §7051, every person who removes any part of any human remains from any place where it has been interred, or from any place where it is deposited while awaiting interment or cremation, with intent to sell it or to dissect it, without authority of law, or written permission of the person or persons having the right to control the remains under California PRC §7100, or with malice or wantonness, has committed a public offense that is punishable by imprisonment in the state prison.

# Removal and Damage of Paleontological, Archaeological, and Historic Resources

Under California Code of Regulations, Title 14, §4307, the state preservation law, no person shall remove, injure, deface, or destroy any object of paleontological, archaeological, or historical interest or value.

### 4.4.2.1.3 **Local**

# **City of Los Angeles Cultural Heritage Ordinance**

The City of Los Angeles enacted a Cultural Heritage Ordinance in April 1962 (Los Angeles Administrative Code, §22.130), which defines Los Angeles Historic-Cultural Monuments (LAHCM). According to the Cultural Heritage Ordinance, LAHCM are sites, buildings, or structures of particular historical or cultural significance to the City of Los Angeles in which the broad cultural, political, or social history of the nation, state, or City of Los Angeles is reflected or exemplified, including sites and buildings associated with important personages or which embody certain distinguishing architectural characteristics, or are associated with a notable architect. LAHCM are regulated by the City's Cultural Heritage Commission and the City Council.

The Cultural Heritage Ordinance establishes criteria for designating local historical resources and/or historic districts as LAHCM (Los Angeles Ordinance Number 178,402, Section 22.171.7). These properties must retain integrity and convey their significance under one or more of the following criteria:

#### 4.4 Cultural Resources

- Historic structures or sites in which the broad cultural, economic, or social history of the nation, state, or community is reflected and exemplified; or which are identified with important events in the main currents of national, state, or local history.
- Historic structures or sites identified with historic personages in the main currents of national, state, or local history.
- Historic structures or sites that embody the distinguishing characteristics of an architecturaltype specimen, inherently valuable for a study of a period style or method of construction, or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

## City of Los Angeles Historic Preservation Overlay Zone

The Historic Preservation Overlay Zone (HPOZ) Ordinance of the City of Los Angeles is a planning tool that enables the designation of historic districts. The Project site does not fall within the boundaries of any City-designated HPOZ.

## City of Los Angeles General Plan, Conservation Element

The Conservation Element of the City of Los Angeles General Plan contains the following objectives pertaining to the protection of the archaeological, paleontological, cultural, and historic resources in the City of Los Angeles:

- Protect the City's *archaeological and paleontological resources* for historical, cultural, research, and/or community educational purposes.
- Protect the City's *important cultural and historical sites and resources* for historical, cultural, research, and/or community educational purposes.

The identification and protection of significant archaeological and paleontological sites and/or cultural and historic resources known to exist, or identified during land development, demolition, or property modification activities, is to be achieved through the establishment of permit processing, monitoring, enforcement, and periodic revision of regulations and procedures by the City of Los Angeles departments of Building and Safety, City Planning, and Cultural Affairs.

# 4.4.2.2 Existing Conditions

# 4.4.2.2.1 Paleontological Resources

# **Regional Physiography and Geology**

The Project site is located at the northwestern extent of the Peninsular Ranges Geomorphic Province within the Los Angeles Basin. The Peninsular Ranges Province is comprised of a series of mountain ranges separated by northwest trending valleys paralleling faults that branch off from the San Andreas Fault to the east. The physiographical, geological, and ecological zones represented in the Project area are best described as alluvial valleys of the Los Angeles Basin. The Los Angeles Basin is bounded to the north by the Santa Monica Mountains, to the east by the Santa Ana Mountains and associated hills (Puente/Chino, San Jose, and Repetto),

to the south by the San Joaquin Hills and the Pacific Ocean, and to the west by the Palos Verdes Hills and the Pacific Ocean (Wagner 2002).1

Based on geophysical data and detailed logs of numerous deep wells in the western Los Angeles Basin, a generalized stratigraphic section can be compiled. The deepest basement rocks are composed of Catalina Schist, probably of Mesozoic age, which in turn are overlain by Miocene, Pliocene and Pleistocene sedimentary rocks. The Pliocene and Pleistocene sediments alone amount to several thousand feet of stratigraphic section.<sup>2,3</sup> The sedimentary rocks of concern (i.e., those likely to be encountered in any paleontological monitoring efforts) thus are very young geologically, and would represent only the youngest Pleistocene sediments in the Project vicinity.

Locally, the El Segundo Sand Hills consist of a three to six mile-wide belt of relatively young (Holocene) and relatively old (upper Pleistocene) sand dune complexes that extend along the coast from the Ballona escarpment and southward to the Palos Verdes Hills. The El Segundo Sand Hills overlay the Torrance Plain, which is present to the east. The Project area is characterized by nearly level, ancient floodplain surfaces that have been periodically cut into by high sea levels during interglacial periods, forming the marine terrace platforms that are now covered by alluvial (surficial) and dune deposits. Very gently sloping alluvial fans extend westward from the topographic high areas along the uplifted segments of the Newport-Inglewood fault zone located east of the Project site. Sand dunes dominate the coastal area, with alluvial materials covering Quaternary deposits farther east, beyond the limit of the existing dune fields.

The near-surface geologic units within the Project site consist of modern (Holocene) sand dunes on the edge of the lowest (youngest) marine terrace, older (upper Pleistocene) sand dune complexes (sand and silty sand) on the higher terrace edges, and the upper and middle Pleistocene Lakewood Formation (a catchall formational name for alternating layers of dense to very dense sand, silty sand, and very stiff-to-hard, silty-to-sandy clay and clayey silt). The Lakewood Formation, as originally defined, includes the previously named Palos Verdes Sand, a marine unit that dates to the peak of the last interglacial period about 120,000 years ago. The Palos Verdes Sand is often abundantly fossiliferous, and is the fossiliferous formation that is exposed on the southern Ballona escarpment along Lincoln Boulevard. Most of the Project site is overlain by the older dune deposits whereas the Lakewood Formation underlies the older dunes, but is exposed in the eastern portion of the Project site. Holocene ("modern" or "Recent") dune sand is present between the beach and Pershing Drive (as shown in Figure 4.5-1).4 Although some portions of the Project site still exhibit the characteristics of the original sand dune topography, the original coastal slope and undulating dune complexes were subjected to substantial grading and infilling in the 1950s and 1960s during the development of residential uses at the Project site. No areas within the Project site remain undisturbed by urban development.

Norris, R. M. and R. W. Webb, Geology of California, 1990.

<sup>&</sup>lt;sup>1</sup> Wagner, D.L. <u>California Geomorphic Provinces</u>. California Geologic Survey Note 36, 2002, online at http://www.consrv.ca.gov/cgs/information/publications/cgs\_notes/note\_36/note\_36, accessed December 2012; Gust, Sherri and Courtney Richards (Cogstone), Paleontological Resources Assessment for the Los Angeles International Airport (LAX) Northside Plan Update in Los Angeles County, California, 2012.

<sup>&</sup>lt;sup>3</sup> Yerkes, R.F. T.H. McCulloh, J.E. Schoellhamer, and J.G. Vedder (U.S. Geological Survey), <u>Geology of the Los</u> Angeles Basin, California- An introduction, Volume 420-A: Pages A1-A57; Figures 1-14; Plates 1-4; Tables 1-3; 1965. Saucedo, G.J., H. G. Greene, M.P. Kennedy, and S.P. Bezore, California Geological Survey Regional Geologic Map Series, Map of the Long Beach 30' X 60' Quadrangle, Scale 1:100,000, 2003.

## **Project Site Physiography and Geology**

The Project site is mapped almost entirely as older Quaternary dune sand with scattered regions of modern, artificial fill. The southeasternmost Project Area (Area 10) is mapped as Quaternary older alluvium. Other deposits within the one-mile buffer zone include Holocene beach sand, predeveloped marshlands, and alluvium; Quaternary landslide rubble; and Pleistocene San Pedro Sand, which will not be impacted by construction.<sup>5</sup>

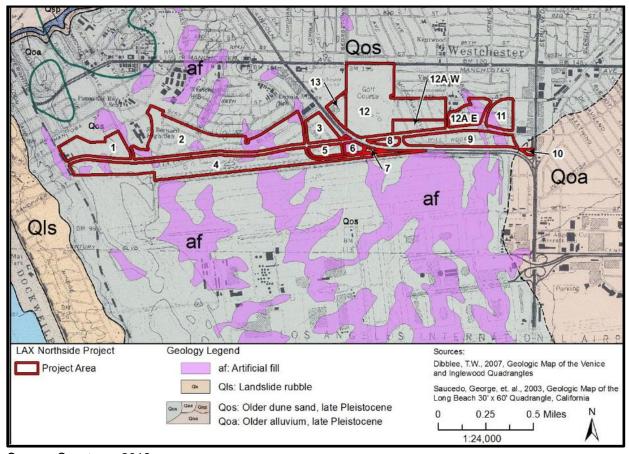


Figure 4.4-1 - Project Site Geology

Source: Cogstone, 2012.

# **Quaternary Dune Sand**

Late Pleistocene (1.26 million to 11,700 years ago) dune sand deposits cover the majority of the Project area. These eolian deposits are weakly consolidated and consist primarily of dense to very dense, well sorted, fine- to coarse-grained silty sand and silt.<sup>6</sup>

#### **Quaternary Older Alluvium**

Deposition of the older alluvium occurred during the late Pleistocene period (1.26 million -11,700 years ago). Sediments range in color from gray to light brown and are composed of unconsolidated to weakly consolidated, dissected, pebble-gravel, sand, and silt-clay.

Ibid.

<sup>&</sup>lt;sup>5</sup> Saucedo, G.J., H. G. Greene, M.P. Kennedy, and S.P. Bezore, <u>California Geological Survey Regional Geologic</u> Map Series, Map of the Long Beach 30' X 60' Quadrangle, Scale 1:100,000, 2003.

#### **Artificial Fill**

Large deposits of fill imported by human activity exist on the Project site.8 Although these sediments may contain fossils, they have been moved from their original locations so they have lost most of their scientific value.

## **Known Paleontological Resources**

A record search by the Natural History Museum of Los Angeles County revealed that no fossils have been previously collected from within the Project site. However, there are vertebrate fossils recorded from the same sediments within a one-mile buffer zone from the Project site.9 Fossils found within the one-mile buffer zone from the Project site were all recovered from depths of 13 feet or greater below the surface in Older Quaternary dune sands and alluvium. Specimens include mammoth, rodent, fish, horse, bison, and rabbit. 10 However, no fossils, whole or fragmentary, were observed during a paleontological survey of the Project site. 11

Due to the presence of known vertebrate fossils that are unevenly and unpredictably distributed, both the Quaternary dune sands and the Quaternary older alluvium are assigned a Potential Fossil Yield Classification (PFYC) value of 3a, or moderate sensitivity for significant paleontological resources. The recent artificial fill has a PFYC value of 1, or very low. While these sediments may contain fossils, they have been removed from their original location and lost their scientific value. 12 The recorded terrestrial vertebrate fossils (mainly mammals) may have come either from the dune deposits or from the underlying, mainly continentally-derived, sediments of the Lakewood Formation. The terrestrial vertebrate fossils, if any, are likely from the Lakewood Formation, and potentially would represent the same assemblage of fossil animals as preserved at the La Brea Tar Pits in the Miracle Mile area of the City of Los Angeles, and elsewhere in the Los Angeles Basin.<sup>13</sup>

The marine vertebrate fossils, reported at greater depths of 65 to 70 feet, likely were derived from the Palos Verdes Sand or underlying middle Pleistocene marine sediments (Lakewood Formation). 14 The Palos Verdes Sand is a richly fossiliferous unit that overlies the marine terrace surface cut approximately 120,000,000 years ago during the peak of the last interglacial period, and which is recognized from the Pacific Palisades area southward, around the Palos Verdes Peninsula, to the Upper Newport Bay area in Orange County. 15 Exposures of the Palos

<sup>&</sup>lt;sup>7</sup> Ibid.

<sup>&</sup>lt;sup>8</sup> Ibid.

<sup>&</sup>lt;sup>9</sup> McLeod, S.A. (Cogstone), <u>Vertebrate paleontology records check for paleontological resources for the proposed</u> LAX Northside Project, Cogstone Project #2246, Los Angeles County, 2012.

10 Ibid, Table 1.

<sup>&</sup>lt;sup>11</sup> Ibid.

<sup>&</sup>lt;sup>12</sup> Gust, Sherri and Courtney Richards (Cogstone), <u>Paleontological Resources Assessment for the Los Angeles</u>

International Airport (LAX) Northside Plan Update in Los Angeles County, California, 2012.

13 Kurten, Bjorn, and E. Anderson, Pleistocene Mammals of North America, Pages i-xvii, 1-443; Figures, 1-17.3, 1980; Langewalter, P.E. II, The fossil vertebrates of the Los Angeles - Long Beach Harbors region, Paleontologic record of areas adjacent to the Los Angeles and Long Beach Harbors, ed. G.L. Kennedy, Pages 36-54, 1975; Miller, W.E., "Pleistocene vertebrates of the Los Angeles Basin and vicinity (exclusive of Rancho La Brea)," Natural History Museum of Los Angeles County, Science Series, Volume 10: Pages 1-124; Figures 1-155; Tables 1-20; 1971; Stock, C., "Rancho La Brea: A record of Pleistocene life in California," Natural History Museum of Los Angeles County, Science Series, Volume 37: Pages i-xiv, 1-113; Figures 1-35; 1992.

City of Los Angeles, LAX Master Plan Final EIR/EIS, Section 4.9.2, Table F.4.2.1, 2004.

<sup>&</sup>lt;sup>15</sup> Kanakoff, G.P. and W.K. Emerson, "Late Pleistocene Invertebrates of the Newport Bay Area, California," Los Angeles County Museum, Contributions in Science, Volume 31: Pages 1-47; Figures1-4; Tables 1-3; 1959; Kennedy, G.L., Paleontological record of areas adjacent to the Los Angeles and Long Beach Harbors, Los Angeles County, California, Marine Studies of San Pedro Bay, California, Eds. D.F. Soule and M. Oguri, Pages i-v, 1-119; Maps 1-5;

Verdes Sand on the southern escarpment of the Ballona Creek drainage, at about the 50-foot elevation level, have yielded extensive collections of fossil invertebrates that are dominated by bivalve and gastropod mollusks (~300 species), as well as two species of marine mammals, ten species of birds, two species of sharks, numerous sting ray teeth and stingers, and numerous specimens of bony fish (bones, teeth, and ear stones).<sup>16</sup>

## 4.4.2.2.2 <u>Archaeological Resources</u>

## **Prehistory**

The Project site lies within a region that was occupied during the late prehistoric period by Native American groups now known as the Gabrielino. The Gabrielino may have numbered as many as 5,000 people at their peak in the pre-European contact period (estimated as 1769 in the Los Angeles basin). However, population estimates are very difficult to make because many of the Native Americans did not come under Spanish control and, consequently, were not included in census records. Later, after most of their culture had been destroyed by disease and displacement, the Native American groups in the vicinity of the Project area came under the control of the United States. There was only a minor Native American presence remaining in California when it became a United States possession and massive development began. Consequently, very little interest in the Native Americans and their prehistory was generated. It was many years later that the size, complexity, and extent of archaeological deposits in the state became apparent and of interest.<sup>17</sup>

# **Ethnography**

The Gabrielino, also known as Tongva, which means "people of the earth" are a Native American people who occupied a large area that was bordered on the west by Topanga and Malibu, the San Fernando Valley, the greater Los Angeles basin, and the coastal strip south to Aliso Creek, south of San Juan Capistrano. Their territory extended from the San Bernardino Mountains to the islands of Catalina, San Clemente, and San Nicolas and occupied most of modern day Los Angeles and Orange Counties, which is incredibly fertile land. They shared their territories to the north with the Tataviam and Serrano groups, to the northwest with the Chumash, and to the east-southeast with the Cahuilla and Luiseño groups. The Gabrielino are also referred to as the Tongva/Gabrielino, Gabrieleño/Tongva, or Gabrielino/Tongva Tribe.

The Gabrieliño were not the first inhabitants of the Los Angeles Basin but arrived around 500 B.C., slowly displacing the indigenous Hokan speakers. The Gabrielino spoke one of the Cupan languages of the Takic family which is part of the Uto-Aztecan linguistic group. <sup>19</sup> This language family is extremely large and includes the Shoshonean groups of the Great Basin. Given the

Tables 1-4; 1975; Valentine, J.W., <u>Upper Pleistocene Mollusca from Portrero Canyon, Pacific Palisades, California, Transactions of the San Diego Society of Natural History</u>, Volume 12(10): Pages 185-205; Figure 1; Plate 13; 1956; Woodring, W.P., M.N. Bramlette, and W.S.W. Kew, <u>Geology and Paleontology of Palos Verdes Hills, California</u>, U.S. Geological Survey, Volume 207; Pages i-v. 1-145; Figures 1-16; Plates 1-37; 1946

Geological Survey, Volume 207: Pages i-v, 1-145; Figures 1-16; Plates 1-37; 1946

16 Hoskins, C.W., Paleoecology and correlation of the lowest emergent California marine terrace, from San Clemente to Half Moon Bay, Pages i-vii,1-188, 1957; Willet, G., An Upper Pleistocene Fauna from the Baldwin Hills, Los

Angeles County, California, Transactions of the San Diego Society of Natural History, Volume 8(30): Pages 379-406; Plates 25-26; 1937; Valentine, J.W., Upper Pleistocene Mollusca from Portrero Canyon, Pacific Palisades, California, Transactions of the San Diego Society of Natural History, Volume 12(10): Pages 185-205; Figure 1; Plate 13; 1956.

17 City of Los Angeles, LAX Master Plan Final EIR/EIS, 2004.

<sup>&</sup>lt;sup>18</sup> Bean, L. and C. Smith, <u>Gabrielino. Handbook of North American Indians</u>, Volume 8, 538 – 549, 1978.

<sup>&</sup>lt;sup>19</sup> Bright, William, The Alliklik Mystery, The Journal of California Anthropology, 2(2), 1975.

geographic proximity of Tongva/Gabrieleño and Serrano bands living in the area and the linguistic similarities, ethnographers have suggested that they shared the same ethnic origins.<sup>20</sup>

Following the Spanish custom of naming local tribes after nearby missions, they were called the Gabrieleño, Gabrieliño, or San Gabrieleño in reference to Mission San Gabriel Arcangel. Likewise, the nearby Tataviam people were known as "Fernandeño" after Mission San Fernando Rey de España.<sup>21</sup>

Very little is known about early Gabrielino social organization because the band was not studied until the 1920s and had already been influenced by missionaries and settlers. Kroeber's (1925) work indicates that the Gabrielino were a hierarchically ordered society with a chief who oversaw social and political interactions both within the Gabrielino culture and with other groups.<sup>22</sup>

The Gabrielino had multiple permanent villages established in the fertile lowlands along rivers and streams and in sheltered areas along the coast. These ranged from seasonal satellite villages to larger more permanent villages connected through economic, religious, and social ties. Gabrielino houses were large, circular, thatched and domed structures of tule, fern, or carrizo that were large enough to house several families.<sup>23</sup> Smaller ceremonial structures were also present in the villages and were used in a variety of ways. These structures were earthcovered, and different ones were used as sweathouses, meeting places for adult males, menstrual huts, and ceremonial enclosures (also known as yuva'r).<sup>24</sup>

Resource exploitation was focused on village-centered territories and ranged from hunting deer, rabbits, birds, and other small game, to sea mammals. Fishing for freshwater fish, saltwater mollusks, and crustaceans, and gathering acorns and various grass seeds were also important. Fishing technology included basket fish traps, nets, bonefish hooks, harpoons, and vegetable poisons. Ocean fishing was conducted from wooden plank canoes, called ti'at, lashed and asphalted together with either tar from the La Brea Pits or asphaltum that had washed up on shore from offshore oil seeps. 25 This type of canoe could hold as many as twelve people with all of their gear and all of the trade goods they were carrying to trade with other people, either along the coast, or on one of the Channel Islands.

Modern place names with Gabrieliño/Tongva origins include: Pacoima, Tujunga, Topanga, Rancho Cucamonga, Azusa, and Cahuenga Pass. Other examples include a 2,656-foot summit in the Verdugo Mountains, in Glendale, named Tongva Peak; and in the Angeles National Forest there is a 32-mile path named the Gabrieleno Trail.

In the 1990s, Kuruvungna Springs, a natural spring located on the site of a former Gabrielino/Tongva village on the campus of University High School in West Los Angeles, was revitalized due to the efforts of the Gabrielino/Tongva Springs Foundation. The spring, which produces 22,000 gallons of water each day, is considered by the Gabrielino/Tongva to be one of their last remaining sacred sites and is regularly used for ceremonial events.

<sup>&</sup>lt;sup>20</sup> Kroeber, Alfred L., Handbook of the Indians of California, Bureau of American Ethnology Bulletin (78), 1925.

<sup>&</sup>lt;sup>21</sup>Bean, Lowell J. and Sylvia B. Vane, eds., Native Americans of Western Riverside County, California and the Devers-Mira Loma 500kV Transmission Line Route (Lamb Canyon – Mira Loma Section), 1979.

Kroeber, Alfred L., Handbook of the Indians of California, Bureau of American Ethnology Bulletin (78), 1925.

<sup>&</sup>lt;sup>23</sup> Johnston, Bernice E., <u>California's Gabrielino Indians</u>, 1962.

<sup>24</sup> Heizer, R.F. and S.F. Cook, <u>Fluorine and Other Chemical Tests of Some North American Human and Fossil</u> Bones, American Journal of Physical Anthropology, 10(3): 289-393, 1952.

Blackburn, Thomas C., Ethnohistoric Descriptions of Gabrielino Material Culture, Annual Reports of the University of California Archaeological Survey, (5): 1-50, 1962-1963.

#### **Historic Overview**

#### **Mexican Period**

The area that became Los Angeles County saw an increase in European settlement during the Mexican Period largely due to the land grants (ranchos) to Mexican citizens by various governors.<sup>26</sup>

The land that was to become LAX was part of Rancho Ajuaje de la Centinela, which was established by Ignacio Machado in 1883. Machado traded his property in 1845 to Bruno Avila, the brother of Antonio Avila who owned the adjacent Rancho Sausal Redondo. Together the brothers owned 25,000 acres of valuable land upon which the City of Inglewood and LAX would later be built.<sup>27</sup>

#### **American Period**

In 1894, Andrew Bennett leased 2,000 acres (which now comprises the major part of LAX) from Freeman and planted wheat, barley, and beans. Over the next 30 years, Bennett expanded his ranch to 3,000 acres, ran a successful ranch into the 1920s, and took an active role in the development of Inglewood as a builder and developer. In the early 1920s, William M. Mines leased a small section of Bennett's ranch for an aircraft landing strip between the fields. The dirt airstrip became known as Mines Field.

Though the aviation industry was still in its infancy, the City of Los Angeles (settled in 1791 and incorporated in 1850) recognized its potential and began to look for an airport site. Since the federal government forbade the use of federal funds to build or develop airports, the establishment of municipal airports required local government action. In 1926, Mines Field was included on a list of 13 possible sites for a municipal airport published by the Los Angeles Chamber of Commerce. The selection of Mines Field in 1927 as the site for the 1928 National Air Races, contributed to the final decision. On July 25, 1928, the City of Los Angeles selected Mines Field for the municipal airport and leased 640 acres of ranch property for ten years for use as an airport beginning on October 1, 1928. The airport was dedicated on June 7, 1930. The same year, the lease on the land was re-negotiated to 50 years, a demonstration of Los Angeles' commitment to the airport.

# **Historic Overview of LAX and Surrounding Community**

The start of World War II brought about rapid development of the Airport. Wartime demands led to the purchase of additional land, expansion of the two main runways, and the installation of an instrument landing system. This expansion received support from the citizens of Los Angeles with the passage of a 12-million-dollar bond issued in 1945. In 1949, runways were again extended and the purchase of additional properties increased the size of the Airport to almost 3.000 acres.

The post-war years brought increasing changes. The primary impetus for these changes was the inauguration of a commercial airline service in 1946. The importance of this new role was recognized when the Airport was officially named Los Angeles International Airport (LAX) in 1949.

<sup>&</sup>lt;sup>26</sup> SWCA Environmental Consultants, <u>Cultural Resources Final Report of Monitoring and Findings for then Qwest</u> Network Construction Project, State of California, 2006.

McAvoy, Christy Johnson, Hangar One National Register of Historic Places Registration Form, 1991.

During this period of Airport growth, the surrounding area was experiencing marked changes. The Airport was no longer isolated from Los Angeles and surrounding cities, as industrial development encroached upon its boundaries. Other factors contributing to adjacent development were the favorable climate and the national trend of migration to the suburbs. The announcement of Airport expansion plans did not curtail residential growth in the nearby area.

In anticipation of jet service requirements, the voters of Los Angeles passed a 59-million-dollar bond issue in 1956 for the development of a new passenger terminal complex. With the advent of commercial jet service in 1959, the Airport experienced its greatest increase in air passenger demand. In response, it created several major expansion programs.

In 1961, Vice President Lyndon B. Johnson dedicated the new Central Terminal Area (CTA). In 1963, the voters of Los Angeles approved a charter amendment enabling the Department of Airports (DOA) to issue revenue bonds to finance the north runway complex, the construction of new multi-deck parking structures, and the purchase of clear zone properties in Playa del Rey. The first revenue bonds, totaling 30 million dollars, were sold in 1965.

The DOA acquired noise-impacted residences, relocated residents, and removed structures in the period from the late 1960s to late 1970s. In total, 2,834 residences were acquired, which resulted in the relocation of about 7,000 residents. While land was acquired to the west, north, and east of the Airport during this acquisition period, the 340 acres located northerly of the north runway system, westerly of Sepulveda Boulevard, and easterly of Pershing Drive were acquired for airport-compatible development in 1982.<sup>29</sup>

#### **Community of Westchester**

Development of the area north of the Airport property began as early as 1939 when plans for Westchester's first subdivision were submitted to the Los Angeles Planning Commission. The first housing unit was begun late in 1940. Developer Silas Nowell was required to construct a number of houses before the Federal Housing Administration (FHA) approved the area for residential loans with FHA backing.

Not far behind Nowell came the firm of Marlow and Burns with ideas of its own about subdividing the acreage. Fred W. Marlow was a recently-resigned FHA director for California. Fritz B. Burns was an experienced realtor and developer, at that time best known for his development of Playa del Rey. As Burns described the early years of development,

There wasn't much here in 1941. Charlie Crawford [an executive at Los Angeles Extension Company] stirred our interest in starting an operation here and the first thing Fred Marlow and I knew, we were committed to take on 1,400 acres. The price was around \$1,100 an acre and the bank was glad to see us. You wonder why an area like this remains dormant for so many years. The answer is that the distance from one place to another isn't measured in miles, but by the amount of intervening vacant territory. There was plenty between Westchester and downtown in those days, so Westchester was considered a long way out.<sup>30</sup>

The concentration of jobs at the Airport during wartime had attracted "community builders" interested in developing master-planned communities for defense workers who were eligible for FHA assistance. The community of Westchester continued to grow during this period as a business district was developed within

\_

<sup>&</sup>lt;sup>28</sup> City of Los Angeles, <u>LAX Northside Development Project Final EIR</u>, 1982.
<sup>29</sup> Ibid.

<sup>&</sup>lt;sup>30</sup> Dukesherer, David J., <u>Westchester: An Early History of Westchester & Playa Vista, California</u>, Los Angeles: Central Historical Group, 2010.

the comprehensively planned community. Created in 1946 to serve the suburb of Westchester and its expected population of around 50,000 persons of moderate income, the Westchester Business District was located on both sides of Sepulveda Boulevard between Manchester and 96th Street.<sup>31</sup>.

#### Playa del Rey California National Guard Base and Nike-Ajax Missile Facility

The westernmost corner of the Project site is adjacent to an area called Playa del Rey, a coastal community which was occupied by scattered beach houses in the early 20th century. Like Westchester, Playa del Rey experienced its greatest period of development during the post-WWII boom of the 1940s and 1950s. The area of Playa del Rey that is adjacent to the Project site, however, has historically been used by the military, first as a California National Guard Base beginning in 1947, then as a Nike Missile Facility in the 1950s and 1960s. Figure 4.4-2 depicting its location is included below. Unless otherwise noted, the following history of the Playa del Rey Nike-Ajax Missile Facility is excerpted from the Fort MacArthur Military Museum website:

After the establishment of the Army Antiaircraft Artillery Command in 1950, Anti-Aircraft Artillery (AAA) battalions were slowly being brought up to strength and assigned to the Pacific coast.<sup>35</sup> During most of the 1950s and much of the 1960s, the United States saw attacks by large formations of bomber aircraft as its primary strategic threat from Russia. Its answer to this threat came to be Nike supersonic anti-aircraft missile launch sites surrounding key American population and industrial centers such as Los Angeles.

In 1954, the Army began operating its first Nike missile launch site in the Los Angeles area. The site was located in the Santa Monica Mountains above Malibu. In late 1952, the 47th Air Defense Brigade established its headquarters at Fort MacArthur in San Pedro to assume responsibility for providing air defenses for the Los Angeles area. By 1958, the brigade had established 16 Nike launch sites ringing the Greater Los Angeles area. These sites were located in Malibu, Van Nuys, Chatsworth, Newhall, Saugus, Mt. Gleason, Barley Flats, El Monte, Brea, Stanton, Long Beach, San Pedro, Palos Verdes, Torrance, El Segundo, and Playa del Rey. At each site, missiles were concealed in underground bunkers and, in the event of a threat, were brought to the surface, loaded onto missile launchers and elevated for firing.<sup>36</sup>

On June 1, 1957, the 720<sup>th</sup> AAA Battalion (90 mm gun) was reorganized and redesigned as the 720<sup>th</sup> Missile Battalion (Nike-Ajax). This was the first National Guard unit to be designated as a missile unit. On September 14, 1958, the 47<sup>th</sup> Artillery Brigade turned over operational control of four Nike-Ajax missile

<sup>&</sup>lt;sup>31</sup> City of Los Angeles, LAX Master Plan Final EIR/EIS, 2004.

Pattison, Ethel, Flight Path Learning Center of Southern California, Personal Communication, July 25, 2012.

<sup>&</sup>lt;sup>33</sup> Project Nike was a line-of-sight anti-aircraft missile system developed and installed in the United States in the 1940s and 1950s

<sup>&</sup>lt;sup>34</sup> Hasenauer, David J., President, Jet Pets Animal Quarantine Facility, <u>Personal Communication</u>, July 25, 2012; Los Angeles County Office of the Assessor, <u>Parcel Viewer</u>, online at http://maps.assessor.lacounty.gov/mapping/viewer.asp, accessed August 2012; Stokes S.E. and M.A. Berhow, <u>The 47<sup>th</sup> Artillery Brigade at Fort MacArthur, 1952-1969</u>, Fort MacArthur Military Museum website, online at http://www.ftmac.org/Lanike2.htm, accessed August 2012.

<sup>2012.

35</sup> Stokes S.E. and M.A. Berhow, The 47<sup>th</sup> Artillery Brigade at Fort MacArthur, 1952-1969, Fort MacArthur Military Museum website, online at http://www.ftmac.org/Lanike2.htm, accessed August 2012.

<sup>&</sup>lt;sup>36</sup> Fort MacArthur Military Museum website, <u>The Nike Missile Air Defense System webpage</u>, online at http://www.ftmac.org/lanike1.htm, accessed August 2012.

batteries to the California National Guard, including Battery D - Site LA 73 at the Playa del Rey site [in the Project area]. This was the first time a National Guard unit assumed operational control of Nike missile batteries, and was to serve as a model for the eventual takeover of all Nike sites by the National Guard.<sup>37</sup>

In May of 1959, Battery D was reorganized but remained at its original station. On May 1, 1963, Battery D closed its Nike-Ajax site at Playa del Rey and moved to a new station. By the end of the 1960s, the need for anti-aircraft missiles had begun to diminish as Intercontinental Ballistic Missiles (ICBMs) became the dominant strategic threat. By 1971, only 6 of the 16 original Nike launch sites in the Los Angeles area remained operational. On February 4, 1974, the Army ordered all Nike missile sites to deactivate. Few signs are left of the former Los Angeles Nike missile system. Some sites are now used for government and commercial facilities and several former sites have been demolished.<sup>38</sup>

It is approximated that the Playa del Rey Nike Missile Facility was demolished during the 1980s, a process which took approximately three years to complete.39 The remaining buildings from the Nike-Ajax Missile Facility remained inactive until the 1970s, when the Jet Pets Animal Quarantine Facility was established. There are very few elements of the Nike-Ajax Missile Facility left today, and the reuse of existing buildings and structures is detailed in Section 4.4.2.2.3 below.

Paser del Rey

St. Bernard
High Seh

St. Bernard
High Seh

St. Bernard
High Seh

Age

St. Bernard
High

Figure 4.4-2 - Former Location of Nike Missile Facility (Indicated by Blue Arrow)

Source: Cogstone, 2012.

# **Known Archaeological Resources**

A records search was conducted at the South Central Coastal Information Center (SCCIC), the recognized California repository for previously recorded cultural resource site records, previously completed investigations, and other documents pertaining to cultural resources located in Los Angeles, Orange, and Ventura Counties. The records search revealed 11 previously-recorded archaeological resources within the SCCIC records search area. The SCCIC records search area included the LAX property and a quarter-mile buffer from the LAX

38 Ihio

<sup>37</sup> Ibid.

<sup>&</sup>lt;sup>39</sup> Hasenauer, David J., President, Jet Pets Animal Quarantine Facility, <u>Personal Communication</u>, July 25, 2012.

property. The LAX property comprises the Airport, including runways, terminal areas, hangars, and associated buildings, as well as the Project site. Of those 11 previously-recorded archaeological resources, one archaeological resource was identified as being located within the Project site: 19-001118. In addition, four isolated artifacts were identified within the SCCIC records search area, but not within the Project site. No archaeological resources were listed on the Archaeological Determination of Eligibility (DOE) list. Site 19-001118 was recorded in 1981 by G. Stickel and Steve Appier. It is a prehistoric site consisting of a shell midden with isolated lithic debitage, which is a debris collection of shells, and an isolated collection of flakes that were removed from larger rocks. Stickel and Appier made no determination for the NRHP, California Register of Historic Resources (CRHR), or local register eligibility. Site 19-001118 was updated in 1995 during an intensive pedestrian survey by Ron Bissell who found that Site 19-001118 had been extensively damaged since 1981 by grading and by the construction of Westchester Boulevard. Bissell felt there was the potential that substantial subsurface deposits may have remained and recommended that test excavations be conducted but made no recommendations for NRHP, CRHR, or local registry eligibility. Victor Globa identified Site 19-001118 during a 2008 literature review and made no recommendations for NRHP, CRHR, or local registry eligibility. Therefore, though one archaeological resource was reported within the Project site, no archaeological resources were identified as NRHP, CRHR, or local registereligible or –listed within the Project site as a result of the SCCIC records search.

The LAX Master Plan Final EIR/EIS reports six archaeological sites (four of which were also reported by the SCCIC) and two isolates (also reported by the SCCIC) within the SCCIC records search area, but outside of the Project site. The precise locations of these archaeological sites and the supplemental site record forms are not disclosed pursuant to Title III Section 304 of the 1966 NHPA, as amended, to prevent harm and unauthorized disturbance of the sites.

In summary, the SCCIC records search and LAX Master Plan Final EIR/EIS, combined, reported eight previously recorded archaeological sites and four isolates in the SCCIC records search area, of which one archaeological site was identified as being located within the Project site: Site19-001118.

The SCCIC also provided a list of 54 previously-conducted investigations within the SCCIC records search area. Of the 54 previously-conducted investigations, six were identified as overlapping with the Project site: LA309 (1987), LA3673 (1987), LA4867 (2001), LA4910 (1995), LA6248 (2002), and LA10826 (2004). LA309 was an intensive pedestrian survey conducted in 1987 by Robert J. Wlodarski for the construction of the North Outfall Replacement Sewer Project. No cultural resources were identified during the LA309 survey. LA3673 was another field survey conducted in 1987 for the construction of the North Outfall Relief Sewer. The LA3673 survey identified seven cultural resources, none of which are located within the Project site. LA04867 was a cultural resource assessment conducted by Nicole Wallock in 2011 for Cingular Wireless. No cultural resources were identified during the LA04867 survey. LA4910 was a survey conducted for LAX in 1995 by Rod Raschke who identified four cultural resources. only one of which (19-001118) lies within the Project site. LA6248 was a Phase I archaeological survey conducted for Fire Station Number 5 in 2002 by Alice E. Hale. No cultural resources were identified during the LA6248 survey. LA10826 was a literature review conducted for the Westchester Golf Course and LAX in 2008. Six cultural resources were identified in the LA10826 literature review, only one of which (19-00-001118) lies within the Project site.

### 4.4.2.2.3 <u>Historic Architectural Resources</u>

The SCCIC reported that 33 previously-recorded historic architectural resources are within the records search area. However, none of these previously-recorded historic architectural resources were identified as being within the Project site. Of the 33 previously-recorded historic architectural resources in the SCCIC records search area beyond the Project site, one resource, Hangar One, is listed both on the NRHP and LAHCM (NRIS 92000959; LAHCM Number 44; 19-174101). Hangar One was constructed in 1929 and is located at 5701 West Imperial Highway. The SCCIC did not report any other NRHP or CRHR-eligible or -listed properties in the SCCIC records search area.

In addition, there were two other properties listed as LAHCMs within the SCCIC records search area: Loyola Theatre (Number 259, declared in 1982), and the Airport Theme Building (Number 570, declared in 1993). The Loyola Theatre was constructed in 1948 and is located at 8610 South Sepulveda Boulevard. The Airport Theme Building was constructed in 1961 and is located at 201 Center Way.

Two of the previously-recorded historic architectural resources were located within 500 feet of the Project site: 19-150442 and 19-150445. 19-150442 is the Broadway-Westchester Department Store which is located at 8739 South Sepulveda Boulevard and was constructed in 1948, 19-15445 is the Korner Deli Restaurant, which is located at 8901-8911 South Sepulveda Boulevard and was constructed in 1950. Both buildings were recorded in 1987 by Richard Starzak and are part of the Westchester Business District which was primarily developed in the 1950s. An Neither building was listed or determined to be eligible for listing to the NRHP, CRHR, or as a historical resource for purposes of CEQA. Other property types within the search area include commercial buildings, residences, and hotels, as well as hangars and other buildings associated with the Airport property.

Within the search area, there are no bridges listed in the Caltrans Statewide Bridge Inventory of Local Agency and State Agency Bridges for Los Angeles County that have been assigned a National Register status designation indicating they are listed on the NRHP (status designation 1), eligible for NRHP listing (status designation 2), or may be eligible for NRHP listing (status designation 3).

In addition, the SCCIC reported that the California Historic Resources Inventory (HRI) listed 81 additional previously-recorded historic architectural resources that have been evaluated for historical significance within the search area; however, locational maps and site forms for these resources were not provided by or available from the SCCIC.

The 2004 LAX Master Plan Final EIR/EIS identifies six previously recorded historic architectural resources within the search area, only three of which had been reported in the SCCIC results. The 2004 EIR/EIS did not report any resources as being within the Project site.

In summary, the SCCIC record search and the EIR/EIS, combined, reported 117 previously recorded historic architectural resources in the search area. No previously recorded historic architectural resources, with a known location, were identified as being within the Project site.

# **Project Site Built Environment**

The Project site is composed of 13 Areas totaling approximately 340 acres of land. Areas 2, 3, 5, 6, 7, 8, 10, and 12A West, are undeveloped and largely vegetated with trees, shrubs, and

-

<sup>&</sup>lt;sup>40</sup> Dukesherer, David J., <u>Westchester: An Early History of Westchester & Playa Vista, California</u>, Los Angeles: Central Historical Group, 2010.

grasses. Areas 1, 4, 9, 11, 12A West, 12, and 13 are wholly or partially developed and/or used for construction staging.

#### Jet Pets Animal Quarantine Facility (Area 1)

The Jet Pets Animal Quarantine Facility is an industrial-style complex comprised of four onestory buildings: the main office, a boarding facility, an associated office building, and a shed (Figure 4.4-3). The main office, boarding facility, and office building were constructed in 1947, and the shed appears to be recently constructed. 41 The existing Jet Pets Animal Quarantine Facility complex was originally part of a larger group of buildings used as a residential area for the California National Guard Base from 1947 through the 1960s. During this period, the main office served as the dock for the mess hall, the boarding facility was a barracks building, and the associated office building was an officer's Post Exchange. In the 1950s and 1960s, a Nike-Ajax Missile Facility (Site LA73 Playa del Rey) was located just south of the residential area, but was decommissioned by 1963. After this, the site was vacant for a few years. 42 In 1969, the site was reclaimed for use as a stable, kennel, and animal shipping facility. The property's current use as an animal quarantine facility began in 1972. By 1973, the site had been acquired by LAWA and the current Jet Pets Animal Quarantine Facility was established. Early renovations included the removal of former mess hall equipment (e.g., boilers in the 1970s) and military facilities (aiming systems, Nike Missile silos in the 1980s), and recent alterations include window and roof replacements in 2007-2008.<sup>43</sup>

The main office has a rectangular plan and a south-facing orientation (Figure 4.4-3). The walls are constructed of painted concrete block. The main office building has a very low-pitch frontgabled and shed roof of composition shingle which features mounted lights and wooden signage. There are non-historic period sliding vinyl-framed windows with sills that are arranged asymmetrically. The main entry, which is centered on the primary façade, is elevated above a stoop which is faced with non-historic period flagstone, enclosed by a non-historic metal railing, and recessed beneath a roof overhang. The entry is filled with a non-historic double wooden door with lights. These non-historic period elements appear to be from the last five to fifteen years.

The boarding facility has a T-shaped plan and an east-facing orientation (Figure 4.4-3). The boarding facility walls are constructed of painted concrete block and the flat roof is covered with composition shingle and features a non-historic HVAC (heating, ventilation, and air conditioning) unit. The boarding facility building has wood-framed window sashes with sills, hoods, and wooden shutters, but no glass panes. The windows are arranged symmetrically in a horizontal band. The main entry of the boarding facility is located on the east elevation and contains a single wooden screen door.

<sup>&</sup>lt;sup>41</sup> Los Angeles County Office of the Assessor, <u>Parcel Viewer</u>, online at http://maps.assessor.lacounty.gov/mapping/

viewer.asp, accessed August 2012.

42 Stokes S.E. and M.A. Berhow, <u>The 47<sup>th</sup> Artillery Brigade at Fort MacArthur, 1952-1969</u>, Fort MacArthur Military Museum website, online at http://www.ftmac.org/Lanike2.htm, accessed August 2012.

43 Hasenauer, David J., President, Jet Pets Animal Quarantine Facility, Personal Communication, July 25, 2012.





This Page Intentionally Left Blank

The associated office building has a rectangular plan and an east-facing orientation (Figure 4.4-3). The associated office building walls are constructed of painted concrete block and the flat roof is covered with composition shingle. The associated office building has non-historic sliding vinyl-framed windows with sills that are arranged asymmetrically. There are three entries on the east elevation, all containing non-historic period materials: a double wooden door, a double wooden door with lights, and a single metal security door that is recessed beneath a shed roof overhang. The Jet Pets Animal Quarantine Facility complex also features a non-historic period corrugated metal shed to the east of the three historic-period buildings (Figure 4.4-3). The lot is enclosed with a perimeter chain link fence and includes a paved surface parking lot.

No changes or demolition to the Jet Pets Animal Quarantine Facility is proposed or permitted under the proposed Project.

#### **Historic Architectural Evaluation**

In order to make a determination of the eligibility for the Jet Pets Animal Quarantine Facility for the NRHP and the CRHR, the building was evaluated according to the criteria set by the National Park Service for the evaluation of historical significance by personnel who meet the Secretary of the Interior's Standards (36 CFR Part 61) for Architectural History and History.

NRHP Criterion A/CRHR Criterion 1/Los Angeles Cultural Heritage Ordinance Sec. 22.171.7. Initial research indicated that the Jet Pets Animal Quarantine Facility does not appear to be associated with significant events in the United States, California, or Los Angeles County. While the Jet Pets Animal Quarantine Facility has been historically associated with the California National Guard and the Nike-Ajax Missile Program, the property that now serves as the Jet Pets Animal Quarantine Facility was only used as a residential area and mess hall and is not the site of any important event in military history. 44 The three buildings that remain from the original construction are typical industrial buildings that do not possess any particular significance that conveys the importance of the 1940s-1960s to the local community. In addition, a Nike-Ajax Missile Facility (Site LA73 Playa del Rey) was located on the property in the 1950s and 1960s but is no longer extant. While Nike-Ajax Missile Facilities utilized Cold War technology that was significant to the history of the United States, California, and Los Angeles County, all components of the missile facility formerly located on this property have since been demolished and removed. The missile silos and associated facility components were removed in approximately the 1980s.<sup>45</sup>

Further, the Jet Pets Animal Quarantine Facility does not appear to be important for its association with significant events such as the development of military bases or the invention of Cold War technologies in the City of Los Angeles or Los Angeles County, since it was one of many military facilities constructed during the post-war period in the City of Los Angeles and throughout California. The California National Guard has had a presence in the State since 1854 and the Playa del Rey site is neither the first nor the last remaining base. 46 In addition, at the peak of the Nike-Ajax Missile Facility period, there were 16 missile launch sites guarding the greater Los Angeles area, at least 13 of which are still standing and have been repurposed for other uses. 47 The launch site on the Jet Pets Animal Quarantine Facility property, however, no

<sup>&</sup>lt;sup>44</sup> Los Angeles County Office of the Assessor, <u>Parcel Viewer</u>, online at http://maps.assessor.lacounty.gov/mapping/ viewer.asp, accessed August 2012.

Hasenauer, David J., President, Jet Pets Animal Quarantine Facility, Personal Communication, July 25, 2012.

<sup>&</sup>lt;sup>46</sup> California National Guard, <u>The History of the California National Guard website</u>, online at http://www.calguard.ca.gov/ Pages/History.aspx, accessed August 2012.

Fort MacArthur Military Museum website, The Nike Missile Air Defense System webpage, online at http://www.ftmac.org/lanike1.htm, accessed August 2012; Stokes S.E. and M.A. Berhow, The 47th Artillery Brigade at

longer remains standing and portions have been adapted for other uses. No historical evidence was found to suggest that the Jet Pets Animal Quarantine Facility property could be otherwise tied to important events and trends in military history such as major battles, developments in military strategy or technology, or important activities such as the signing of an important treaty or agreement. The property is not a significant example of a California National Guard Base, a Nike-Ajax Missile Facility, or other Cold War structure. Therefore, the property does not appear to be eligible for listing in the NRHP or CRHR under NRHP Criterion A or CRHR Criterion 1, respectively. In addition, the Jet Pets Animal Quarantine Facility is not a property through which the broad cultural, economic, or social history of the nation, state, or community is reflected or exemplified, nor is it associated with important events in the main currents of national, state, or local history according to the Los Angeles Cultural Heritage Ordinance, Sec. 22.171.7.

NRHP Criterion B/CRHR Criterion 2/ Los Angeles Cultural Heritage Ordinance Sec. 22.171.7. Research has yielded no information indicating the Jet Pets Animal Quarantine Facility property is directly associated with the life and career of an individual who made important contributions to the history of the United States, California, or Los Angeles County, such as an important general or soldier, scientist, or politician who was significantly associated with the formation of the National Guard Base or Nike-Ajax Missile Facility or with the general development of the region. Many people worked and resided at the Jet Pets Animal Quarantine Facility property from the late 1940s through the 1960s in connection with military efforts in the Cold War era; however, there is no evidence that the property should be considered important for representing the significant contributions of any of its residents or staff. Therefore, the property does not possess the requisite significance to qualify for listing in the NRHP or CRHR per NRHP Criterion B or CRHR Criterion 2. In addition, the property is not identified with historic personages in the main currents of national, state, or local history according to the Los Angeles Cultural Heritage Ordinance, Sec. 22.171.7.

NRHP Criterion C/CRHR Criterion 3/ Los Angeles Cultural Heritage Ordinance Sec. 22.171.7. The Jet Pets Animal Quarantine Facility property is a relatively mundane, nondistinctive example of utilitarian military buildings. Military buildings that would be eligible for listing under Criterion C would represent distinctive or pioneering design features for military buildings or structures associated with Cold War technology and this does not appear to be the case for the Jet Pets Animal Quarantine Facility. The utilitarian style was widely used in military. industrial, and commercial architecture throughout the 20th century. According to the Office of Historic Preservation (OHP), "As the military valued nimbleness and flexibility in its training, it relied heavily upon essentially temporary buildings for most operational purposes... The vast majority of Cold War buildings...were built to be inexpensive and easily modified or moved."48 While the property exhibits characteristics associated with the utilitarian style (like the concrete block wall material and flat roof), the Jet Pets Animal Quarantine Facility property does not embody significant philosophies, ideals, or aesthetic achievements.

Furthermore, the Jet Pets Animal Quarantine Facility property has been altered through the removal of buildings from the original California National Guard Base, demolition and removal of the Nike-Ajax Missile Facility and silos, door and window replacements, the addition of paved surface parking, and a metal storage shed. The buildings on the Jet Pets Animal Quarantine Facility property lack a distinguishing design and the property does not appear to be

Fort MacArthur, 1952-1969, Fort MacArthur Military Museum website, online at http://www.ftmac.org/Lanike2.htm,

accessed August 2012.

48 California Office of Historic Preservation, Countdown to Disaster: Perspectives in the Preservation of Cold War Era Cultural Resources, Preservation Matters (5): 1, 2012.

representative of an important example of a military base that may illustrate the variation, evolution, or transition of military base features, uses, or facilities, nor does it illustrate important design or construction for bases. The architect or builder is unknown and, therefore, the Jet Pets Animal Quarantine Facility property does not appear to represent the work of a master. Overall, the Jet Pets Animal Quarantine Facility property is a typical example of a military base that may be found in great numbers throughout California and across the United States. The Jet Pets Animal Quarantine Facility property does not appear to meet NRHP Criterion C or CRHR Criterion 3 because it does not embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possess high artistic values. The Jet Pets Animal Quarantine Facility property does not embody the distinguishing characteristics of an architectural-type specimen, inherently valuable for a study of a period, style, or method of construction, nor is it a notable work of a master builder, designer, or architect whose individual genius influenced his or her age. Therefore, it does not meet the definition of a Historic-Cultural Monument according to the Los Angeles Cultural Heritage Ordinance, Sec. 22.171.7.

**NRHP Criterion D/CRHR Criterion 4**. Finally, in rare instances, buildings and landscape features themselves can serve as sources of important information about historic construction materials or technologies. However, the Jet Pets Animal Quarantine Facility does not appear to be a principal source of important information about the development of Los Angeles or military base design. Therefore, the property does not appear to be eligible for listing in the NRHP or CRHR under NRHP Criterion D or CRHR Criterion 4.

*Integrity*. In order for a property to be eligible, besides meeting one of the NRHP criteria, the property must retain a significant amount of its historic integrity, composed of seven aspects: location, design, setting, materials, workmanship, feeling, and association. Although the Jet Pets Animal Quarantine Facility property has retained its integrity of location, it has not retained its integrity of design, setting, feeling, materials, workmanship, or association.

- Location is defined as the place where the historic property was constructed. The Jet Pets Animal Quarantine Facility has not been moved or relocated and, therefore, retains its integrity of location.
- Design is defined as the composition of elements that constitute the form, plan, space, structure, and style of a property. While portions of the Jet Pets Animal Quarantine Facility property are intact, non-historic age additions have been made to the buildings and several buildings, along with the missile facility, have been demolished or removed from the property. Furthermore, although changes to a property do not necessarily constitute a loss of integrity of design, the removal of an integral feature or defining resource could have a considerable impact on a property. Therefore, since only three of the original military base buildings remain and those buildings have been repurposed for a completely different use, the Jet Pets Animal Quarantine Facility property as a whole does not retain its integrity of design.
- Setting is defined as the physical environment of a historic property that illustrates the
  character of the place. While the Jet Pets Animal Quarantine Facility property was originally,
  and continues to be, bordered by residential development in the community of Playa del Rey
  to the north/west and Westchester to the northeast, changes to the property itself have
  impacted the overall integrity of setting. Due to the removal of the Nike-Ajax Missile Facility
  and other California National Guard Base buildings, the setting aspect of integrity has not
  been retained.

#### 4.4 Cultural Resources

- Materials are defined as the physical elements combined in a particular pattern or configuration to form a historic property during a period in the past. The buildings on the Jet Pets Animal Quarantine Facility property have been heavily altered with window and roof replacements, new porch materials, and metal railings. The integrity of materials has not been retained since non-historic period alterations and installations have occurred.
- Workmanship is defined as the physical evidence of the crafts of a particular culture or people during any given period of history. Evidence of the crafts of a particular culture or people is not present at the Jet Pets Animal Quarantine Facility property, therefore, the property does not exhibit the integrity of workmanship.
- Feeling is defined as the quality that a historic property has in evoking the aesthetic or historic sense of a past period of time. Due to the loss of design, setting, and materials integrity, the Jet Pets Animal Quarantine Facility property no longer retains the historic physical qualities of a military base or missile facility. In its current use as an animal quarantine facility, the buildings no longer serve their original function or use, so the property no longer evokes a historic sense of a past period of time. Therefore, the feeling of the property as a Cold War military base has not been retained and the property does not exhibit the integrity of feeling.
- Association is defined as the direct link between a property and the event or person for which the property is significant. The Jet Pets Animal Quarantine Facility property does not possess integrity of association, because it does not exhibit features or characteristics which convey the direct link between any significant events or people and the historic-period property.

In summary, the Jet Pets Animal Quarantine Facility does not appear to be eligible for listing in the NRHP CRHR, local register, or to be considered a historical resource for purposes of CEQA.

## Temporary Construction Materials and Staging (Areas 4 and 11)

Area 4 is currently used as a temporary construction and staging area for construction projects at LAX. Area 4 contains a dirt-covered parking area and several temporary/mobile structures, such as containers and trailers (**Figure 4.4-4 A**).

Area 11 is currently used as a temporary construction and staging area for construction projects at LAX. Area 11 contains several temporary structures such as mobile trailers (**Figure 4.4-4 B**).

Neither Area 4 nor 11 contain permanent structures that would require evaluation of historic resources and, thus, would not be considered historical resources for the purposes of CEQA.



Figure 4.4-4 - Existing Construction Staging Areas (Areas 4 and 11)





B. Construction Staging at Area 11

Source: Google Maps, 2014.

### Radar Facility (Area 9)

Area 9 contains a radar facility which was constructed between 1978 and 1982. 49 It is composed of three small and one large one-story buildings, as well as a metal rotating structure (**Figure 4.4-5**). The large building is L-shaped and the other three buildings have a rectangular footprint. All four buildings feature flat roofs covered with unknown material. The walls are constructed of concrete block with some wall vents. All of the buildings lack windows, and their entries contain single and double metal doors with small concrete stoops. The radar is a metal rotating structure atop a metal scaffold structure. The radar facility is enclosed by a perimeter chain link fence and features a paved surface parking lot. The radar facility is not over 50 years old and, therefore, does not require evaluation for historic significance and is not considered a historical resource for the purposes of CEQA.



Figure 4.4-5 - Existing Radar Facility (Area 9)

Source: URS Corporation, 2014.

1

<sup>&</sup>lt;sup>49</sup> City of Los Angeles, Los Angeles World Airports, <u>Airport Layout Plans and Taxiway Designation Maps</u>, 1951, 1955, 1969, 1974, 1978, 1982, 1983, 1985, 1990, 1995, 1998, and 2002.

## City of Los Angeles Fire Station Number 5 (Area 12A West)

Area 12A West contains City of Los Angeles Fire Department (LAFD) Station Number 5, which was constructed in 2005 (**Figure 4.4-6**). LAFD Fire Station Number 5 is composed of two contemporary industrial-style buildings: a main building and a garage. The main building is two stories and the garage is one-story, and both have irregular-shaped plans. Both buildings have flat roofs covered with unknown materials and the main building features signal lights on the rooftop. The walls are clad with a combination of stucco, brick, and concrete block. Wall features include scoring in the stucco, decorative metal panels, and metal awnings. The main building has aluminum-framed windows with sills and hoods, arranged symmetrically. The main entry is located on the south elevation and contains double aluminum-framed glass commercial doors with side lights and transom. LAFD Station Number 5 features a flagpole with a decorative brick base, low concrete block planters, concrete sidewalks, landscaping, and a paved surface parking lot. LAFD Station Number5 is not over 50 years old and, therefore, does not require evaluation for historic significance and is not considered a historical resource for the purposes of CEQA.



Figure 4.4-6 - LAFD Station Number 5 (Area 12A West)

Source: Google Maps, 2014.

### **Westchester Golf Course (Area 12)**

Area 12 contains the Westchester Golf Course, which was developed from approximately 1965 to 1966. The Westchester Golf Course property (**Figure 4.4-7**) comprises an 18-hole public golf course, a driving range, and a clubhouse. In the southwest corner of the Westchester Golf Course, there is a paved concrete surface with an electronic equipment structure, enclosed by a chain link fence. An approximately 20-foot-tall noise wall is located along the entire northern boundary of the parcel, separating the Westchester Golf Course from the residential development to the north.

The Westchester Golf Course is an executive golf course, composed of many par-3s plus a small number of par-4s and par-5s, so that it is much shorter and has a lower par than a regulation 18-hole course (**Figure 4.4-7A**). The Westchester Golf Course has a grass covering and features walkways, trees, and light posts. In 1993, the Westchester Golf Course lost three of its holes during the construction of Westchester Parkway and operated as a 15-hole course for almost 20 years. In 2010, the Board of Airport Commissioners (BOAC) agreed to the restoration of the three holes, returning the course to a standard 18-hole configuration.<sup>51</sup>

The driving range consists of a grass and dirt-covered area with a small contemporary outbuilding (**Figure 4.4-7B**). The outbuilding is one-story, with a rectangular plan and a south-facing orientation. It has a flat roof of composition sheet. The walls are clad in vertical wood siding and feature a non-historic period sign on the north elevation. A single fixed window is visible on the north elevation. The main entry is located on the south elevation, but is not visible from the public vantage point.

The clubhouse is a Spanish Colonial Revival-style building with a north-facing orientation (**Figure 4.4-7C**). It is one-story with a rectangular plan and two distinct ends: a western half that serves as the restaurant and pro shop, and an eastern half used to store and wash golf carts. The western half has a low-pitch, side-gabled roof covered with clay tile, and the walls are clad with smooth stucco and wood siding. The eastern half has a flat roof covered with corrugated metal, and the walls are clad in corrugated metal as well. The building features non-historic period fixed and sliding aluminum-framed windows. The sidewalk leading to the entry is covered by the roof overhang which is supported by rectangular columns clad in stucco. The main entry, which is centered on the primary façade, is recessed beneath the awning and contains a non-historic period double aluminum-framed glass commercial door with transom.

No changes to the Westchester Golf Course are contemplated or permitted under the proposed Project.

"I Bismarck Tribune, "Missing Holes Returning," <u>Bismarck Tribune</u>, June 25, 2009; Ebright, Olsen, "15-Hole Golf Course Finally Gets Three Holes Back," <u>Los Angeles Times</u>, February 3, 2010; Groves, Martha, "Westchester '15-hole' Golf Course to Have Three Holes Restored," <u>Los Angeles Times</u>, June 22, 2009.

\_

 <sup>&</sup>lt;sup>50</sup> Bruner, Andy, "Focus on Golf/The Year in Review; Charting a New Course; Los Angeles Has Had a Vast Pool of Golfers; Now It Has a Few High-End Courses on Its Landscape," <u>Los Angeles Times</u>, November 2, 2000; Irving, Doug, "No Holes Barred in Golfers' Fight with LAX," <u>Daily Breeze</u>, February 2, 2007.
 <sup>51</sup> Bismarck Tribune, "Missing Holes Returning," <u>Bismarck Tribune</u>, June 25, 2009; Ebright, Olsen, "15-Hole Golf

Figure 4.4-7 - Westchester Golf Course (Area 12)



A. Westchester Golf Course

Source: http://www.westchestergc.com

B. Westchester Golf Course Driving Range

Source: URS Corporation, 2012.





C. Westchester Golf Course Clubhouse

Source: Google Earth, 2014.

#### Historic Architectural Evaluation

**NRHP Criterion A/CRHR Criterion 1/Los Angeles Cultural Heritage Ordinance Sec. 22.171.7**. Initial research indicated the Westchester Golf Course property does not appear to be associated with significant events in the United States, California, or Los Angeles County. The Westchester Golf Course was constructed from approximately 1965 to 1966. <sup>52</sup>

The Westchester Golf Course does not appear to be important for its association with significant events such as the development of recreation in the City of Los Angeles or Los Angeles County as it was one of many golf courses during the mid-20<sup>th</sup> century in the County and in the region of Southern California. No historical evidence was found to suggest that the Westchester Golf Course could be otherwise tied to important events and trends in the history of golf such as major tournaments, athletic achievements or records set for the profession of golf, or important activities such as a business agreement made during the course of a round. Therefore, the Westchester Golf Course property does not appear to be eligible for listing in the NRHP or CRHR under NRHP Criterion A or CRHR Criterion 1. In addition, the Westchester Golf Course is not a property through which the broad cultural, economic, or social history of the nation, state, or community is reflected or exemplified, nor is it associated with important events in the main currents of national, state, or local history according to the Los Angeles Cultural Heritage Ordinance, Sec. 22.171.7.

NRHP Criterion B/CRHR Criterion 2/ Los Angeles Cultural Heritage Ordinance Sec. 22.171.7. Research has yielded no information indicating the Westchester Golf Course property is directly associated with the life and career of an individual who made important contributions to the history of the United States, California, or Los Angeles County, such as an important golfer, community member, or business leader that was significantly associated with the profession of golf or the general development of the region. Research did not reveal the name of the developer of the Westchester Golf Course property. Furthermore, although many people have been members of the Westchester Golf Course or have been on the grounds, there is no evidence that the Westchester Golf Course property should be considered important for representing the significant contributions of any of its members or staff. Therefore, the Westchester Golf Course property does not possess the requisite significance to qualify for listing in the NRHP or CRHR per NRHP Criterion B or CRHR Criterion 2. In addition, the Westchester Golf Course property is not identified with historic personages in the main currents of national, state, or local history according to the Los Angeles Cultural Heritage Ordinance, Sec. 22.171.7.

NRHP Criterion C/CRHR Criterion 3/ Los Angeles Cultural Heritage Ordinance Sec. 22.171.7. The Westchester Golf Course property is a relatively mundane example of a mid-20<sup>th</sup> century golf course. Golf courses that would be eligible for listing under Criterion C would represent distinctive or pioneering design features for golf course landscapes and this does not appear to be the case for the Westchester Golf Course. The Westchester Golf Course property is a typical executive course, composed of many par-3s plus a small number of par-4s and par-5s, so that it is shorter and has a lower par than a regulation 18-hole course. The Westchester Golf Course contains common golf course features such as course holes, putting greens, a driving range, and landscaping of grass and trees.

Furthermore, the Westchester Golf Course lost a section of its property, including three holes, during the expansion of Westchester Parkway in 1993. For almost 20 years, the Westchester

<sup>&</sup>lt;sup>52</sup> Bruner, Andy, "Focus on Golf/The Year in Review; Charting a New Course; Los Angeles Has Had a Vast Pool of Golfers; Now It Has a Few High-End Courses on Its Landscape," <u>Los Angeles Times</u>, November 2, 2000; Irving, Doug, "No Holes Barred in Golfers' Fight with LAX," <u>Daily Breeze</u>, February 2, 2007.

Golf Course operated with only 15 holes and golfers would have to repeat holes to complete an 18-hole round. In 2010, three new holes were created and other improvements were made following an agreement between LAWA and the City of Los Angeles Department of Recreation and Parks. The buildings on the Westchester Golf Course property lack a distinguishing design and have received alterations outside of the historic period. The Westchester Golf Course does not appear to be representative of an important example of a golf course that may illustrate the variation, evolution, or transition of golf course features, uses, or facilities, nor does it illustrate important design or landscaping for courses.

The landscape architect or course designer is unknown and, therefore, the Westchester Golf Course property does not appear to represent the work of a master. Overall, the Westchester Golf Course property is a typical example of a golf course that may be found in great numbers throughout California and across the United States. The Westchester Golf Course property does not meet NRHP Criterion C or CRHR Criterion 3 because it does not embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possess high artistic values. The Westchester Golf Course property does not embody the distinguishing characteristics of an architectural-type specimen, inherently valuable for a study of a period, style, or method of construction, nor is it a notable work of a master builder, designer, or architect whose individual genius influenced his or her age. Therefore, the Westchester Golf Course does not meet the definition of a Historic-Cultural Monument according to the Los Angeles Cultural Heritage Ordinance, Sec. 22.171.7.

**NRHP Criterion D/CRHR Criterion 4**. Finally, in rare instances, buildings and landscape features themselves can serve as sources of important information about historic construction materials or technologies; however, the Westchester Golf Course does not appear to be a principal source of important information about the development of Los Angeles or golf course design. Therefore, the Westchester Golf Course property is not eligible for listing in the NRHP or CRHR under NRHP Criterion D or CRHR Criterion 4.

*Integrity*. In order for a property to be eligible, besides meeting one of the NRHP criteria (which the golf course does not satisfy), the property must retain a significant amount of its historic integrity, composed of seven aspects: location, design, setting, materials, workmanship, feeling, and association. Although the Westchester Golf Course property has retained its integrity of location, it has not retained its integrity of design, setting, feeling, materials, workmanship, or association.

- **Location**: The Westchester Golf Course has not been moved or relocated, and therefore retains its integrity of location.
- Design: While portions of the property are intact, non-historic age additions have been made to the buildings and alterations have been made to the golf course landscape. Three holes were removed in 1993, the course was expanded into a neighboring property, and new holes were created in 2010. While changes to a property do not necessarily constitute a loss of integrity of design, the removal of an integral feature or defining resource could have a considerable impact on a property. Therefore, due to the alterations to buildings and the removal and subsequent relocation of three holes, the property does not retain its integrity of design.
- **Setting**: While the Westchester Golf Course was surrounded by residential development from the neighborhood of Westchester when it was originally developed in the 1960s,

\_

<sup>&</sup>lt;sup>53</sup> Bismarck Tribune, "Missing Holes Returning," <u>Bismarck Tribune</u>, June 25, 2009.

<sup>&</sup>lt;sup>54</sup> Agostoni, Kristin S., "Westchester Golf Course gets its 3 missing holes back," <u>Daily Breeze</u>, February 2, 2010.

residences to the east and west of the property were acquired by the Airport and demolished in the 1980s. In addition, Westchester Parkway, which was formerly a two-lane road, was expanded in 1993 to include six lanes. Due to the removal of the former residential development and the alteration of the road and streetscape features in the areas surrounding the property, the setting aspect of integrity has not been retained.

- **Materials**: The integrity of materials has not been retained since non-historic period alterations and installations have occurred.
- **Workmanship**: Evidence of the crafts of a particular culture or people is not present at the property, so the property does not exhibit the integrity of workmanship.
- **Feeling**: Although the property has been in continuous use as a golf course since its initial construction, the reconfiguration of the course and alterations to the area's historic setting have led to a loss of the property's ability to convey the feeling of a past period of time. Therefore, the feeling aspect of integrity has not been retained as a 1960s golf course.
- **Association**: The property does not possess integrity of association, because it does not exhibit features or characteristics which convey the direct link between any significant events or people and the historic-period property.

In summary, the Westchester Golf Course does not appear to be eligible for listing in the NRHP or CRHR, or to be considered a historical resource for purposes of CEQA.

## First Flight Child Development Center (Area 13)

Area 13 contains the First Flight Child Development Center which was constructed in 1999.55 The First Flight Child Development Center was designed by Marmol Radziner and Associates and is a multi-building campus laid out in a U-shape plan (Figure 4.4-8). The main building in the First Flight Child Development Center campus that is visible from the public vantage point is a one-story contemporary commercial building with an irregular plan. The contemporary commercial building features multiple angled rooflines and the roof is covered in corrugated metal sheet and other unknown material. Metal shade canopies are supported by tilting columns and a penthouse structure extends upward near the center of the roof. The walls are clad with a combination of stucco, concrete block, and concrete. The contemporary commercial building has fixed and casement aluminum-framed windows with sills and hoods, arranged asymmetrically. The main entry, which is centered on the primary façade, recessed beneath the projecting roof awning, and obscured by a concrete block wall, contains an aluminum-framed glass commercial door. The contemporary commercial building features light poles, landscaping, concrete sidewalks, and a paved surface parking lot to the south side. The First Flight Child Development Center is not over 50 years old and, therefore, does not require evaluation for historic significance and is not considered a historical resource for the purposes of CEQA.

<sup>&</sup>lt;sup>55</sup> Radziner, Marmol and Associates, <u>Under Construction: The Architecture of Marmol Radziner and Associates</u>, 2002.



Figure 4.4-8 - Child Development Center (Area 13)

Source: Children's Creative Learning Center website, online at http://www.cclc.com/center/ca/first-flight-cdc, 2013.

# 4.4.3 Impact Analysis

# 4.4.3.1 Methodology

# 4.4.3.1.1 Paleontological Resources Assessment

The methods used to develop the paleontological resource assessment of the proposed Project and surrounding area follow guidelines from the Society of Vertebrate Paleontology and included both a literature review and a paleontological records search. <sup>56</sup> Courtney Richards of Cogstone performed a field survey of the Project site on September 11, 2012. The field reconnaissance consisted of a windshield survey followed by intensive pedestrian survey of sediment exposures as encountered. Project Areas 4 and 12 were not surveyed, as Area 4 required additional security clearances, and Area 12 is an active golf course. Photographs were taken to document the condition of the Project site. Ground visibility in the proposed Project area was very poor to poor, ranging between one percent and 25 percent open ground. Vegetation consisting primarily of Acacia trees, telegraph weeds, and ice plants, and grasses obscured portions of the Project area. Where exposed, sediments were mainly artificial fill from previous housing and building developments. However, a few exposures of Quaternary dune

<sup>&</sup>lt;sup>56</sup> Society of Vertebrate Paleontology, "Assessment and mitigation of adverse impacts to nonrenewable paleontological resources – standard guidelines," <u>Society of Vertebrate Paleontology News Bulletin</u> (163):22-27, 1995.

sand in the central portion of Area 9 are present. No fossils, whole or fragmentary, were observed within the Project site.57

Published and unpublished literature concerning Project area paleontological and geological topics was also consulted. Using this information, it was possible to define the surface distribution of the formations involved to estimate their subsurface distribution and gain some estimate of the paleontological productivity of these units. Another important source of data concerning areal distribution of known paleontological localities and productivity of various rock units is the records of pertinent paleontological collections. On August 9, 2012, an archival database search was executed by staff at the Natural History Museum of Los Angeles County to determine whether any of the stratigraphic units found within the Project vicinity had previously vielded significant paleontological resources and whether any known localities lie within or near the Project site.

The PFYC (BLM 2007) utilizes a multi-level scale based on knowledge of the geological formations, record search and survey results to determine the potential to yield significant paleontological resources.<sup>58</sup> The number of localities is the primary determinant. The recent, artificial fill has a PFYC value of 1, or very low. While these sediments may contain fossils, they have been removed from their original location and lost their scientific value. Due to the presence of known vertebrate fossils that are unevenly and unpredictably distributed, both the Quaternary dune sands and the Quaternary older alluvium are assigned a PFYC value of 3a, or moderate sensitivity for significant paleontological resources.<sup>59</sup>

The results of the field survey and literature review were compiled into the Paleontological Resources Assessment, attached as Appendix I of this EIR.

#### <u>Archaeological Resources Assessment</u> 4.4.3.1.2

On January 20, 2012, a records search and literature review was received from the SCCIC of the California Historic Resource Information System of California State University, Fullerton (SCCIC File Number 12067.8789). The SCCIC serves as a regional clearinghouse of the SHPO. The SCCIC records search area included the LAX property and a quarter-mile buffer from the LAX property. The LAX property comprises the Airport, including runways, terminal areas, hangars, and associated buildings, as well as the Project site. The purpose of the SCCIC records search was to ascertain whether cultural resources had been previously identified within the SCCIC records search area and to identify any previous cultural resource investigations that may have included the Project site. The requested SCCIC research included a review of ethnographic and historic literature and maps; federal, state, and local inventories of historic properties: archaeological base maps and site records: and survey reports on file at the SCCIC.

<sup>&</sup>lt;sup>57</sup> Gust. Sherri and Courtney Richards (Cogstone), <u>Paleontological Resources Assessment for the Los Angeles</u> International Airport (LAX) Northside Plan Update in Los Angeles County, California, 2012.

58 Burgou of Lond Monagement, D. 1997.

Bureau of Land Management, Potential Fossil Yield Classification (PFYC) System for Paleontological Resources on Public Lands website, online at

http://www.blm.gov/wo/st/en/info/regulations/Instruction\_Memos\_and\_Bulletins/national\_ instruction/20080/im\_2008-

<sup>009.</sup>html, accessed August 2012.

59 Gust, Sherri and Courtney Richards (Cogstone), Paleontological Resources Assessment for the Los Angeles International Airport (LAX) Northside Plan Update in Los Angeles County, California, 2012.

### 4.4.3.1.3 <u>Historic Architectural Resources Assessment</u>

An intensive architectural history survey of the Project site was conducted on July 25, 2012, by a professional who meets the Secretary of Interior's Professional Qualifications Standards (36 CFR Part 61) in the disciplines of Architectural History and History. The survey assessed the presence of built-environment properties within the Project site which appeared or were known to be older than 45 years of age (i.e., 1967 or earlier). The 45-year standard recognizes that there is commonly a five-year lag between resource identification and the date that planning decisions are made. It explicitly encourages the collection of data about resources that may become eligible for the NRHP or CRHR within that planning period. Following completion of the field survey, properties that appeared to be, or were known to be, older than 45 years of age were evaluated per the criteria of the NRHP and CRHR, and as historical resources for purposes of CEQA.

As part of the historic architectural resources studies, research was conducted relating to the historic context of the Project area, and site-specific research for the existing properties in the Project site. As a result, investigators reviewed the SCCIC search results, the Paleontological Resources Assessment prepared for the proposed Project (Appendix I), the LAX Master Plan Final EIR/EIS, documentation from LAWA, information from the Flight Path Learning Center of Southern California, information from the Los Angeles Public Library, and information from other various online sources.

The SCCIC reviewed the NRHP, the CRHR, the California HRI, the California State Historic Landmarks, California Points of Historical Interest, the OHP Historic Property Data File, and the LAHCM for the SCCIC records search area.

## 4.4.3.1.4 Native American Contact

URS, on behalf of LAWA, contacted the California Native American Heritage Commission (NAHC) to identify Native American Tribes that may have input or concerns that uniquely or significantly affect those Tribes related to planned and proposed airport improvements, or may have information about, or be interested in, the proposed undertaking. The California NAHC responded by letter dated January 5, 2012, providing contact information for various Native American Tribes and individuals. The California NAHC's letter also indicated that review of their Sacred Lands File failed to indicate the presence of Native American cultural resources in the immediate Project area.

# 4.4.3.1.5 <u>Significance Thresholds</u>

# 4.4.3.1.6 Paleontological Resources

According to the L.A. CEQA Thresholds Guide, <sup>61</sup> the determination of significance on paleontological resources shall be made on a case-by-case basis, considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; and
- Whether the paleontological resource is of regional or statewide significance.

<sup>&</sup>lt;sup>60</sup> California Office of Historic Preservation, <u>Instructions for Recording Historical Resources</u>, 1995.

<sup>&</sup>lt;sup>61</sup> City of Los Angeles, <u>City of Los Angeles CEQA Thresholds</u>, 2006.

## 4.4.3.1.7 <u>Archaeological Resources</u>

According to the L.A. CEQA Thresholds Guide, a significant archaeological impact would occur if the project disturbs, damages, or degrades an archaeological resource or its setting that is found to be important under the criteria of CEQA because it:

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological resource questions;
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
- Is at least 100-years-old and possesses substantial stratigraphic integrity; or
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

#### 4.4.3.2 Historical Architectural Resources

According to the L.A. CEQA Thresholds Guide, a significant historical impact would occur if the project would result in:

- A substantial adverse change in the significance of a historical resource;
- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Building; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

# 4.4.3.3 LAX Master Plan Commitments and Project Design Features

## 4.4.3.3.1 LAX Master Plan EIS/EIR Commitments

While LAWA has not established specific ordinances with regard to cultural resources, the LAX Master Plan Final EIS/EIR (State Clearinghouse Number: 2008041058, 2005) provides mitigation measures for the treatment of cultural resources within the Airport property (which includes the Project site). 62

 MM-Paleontological Resources (PA)-1: Paleontological Qualification and Treatment Plan. A qualified paleontologist shall be retained by LAWA to develop an acceptable monitoring and fossil remains treatment plan (that is, a Paleontological Management Treatment Plan - PMTP) for construction-related activities that could disturb potential unique paleontological resources within the project area. This plan shall be implemented and

<sup>&</sup>lt;sup>62</sup> City of Los Angeles, <u>LAX Master Plan Final EIR/EIS</u>, Sections 4.9 and 4.10, 2004.

enforced by the project proponent during the initial phase and full phase of construction development. The selection of the paleontologist and the development of the monitoring and treatment plan shall be subject to approval by the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County to comply with paleontological requirements, as appropriate.

- MM-PA-2: Paleontological Authorization. The paleontologist shall be authorized by LAWA to halt, temporarily divert, or redirect grading in the area of an exposed fossil to facilitate evaluation and, if necessary, salvage. No known or discovered fossils shall be destroyed without the written consent of the project paleontologist.
- MM-PA-3: Paleontological Monitoring Specifications. Specifications for paleontological monitoring shall be included in construction contracts for all LAX projects involving excavation activities deeper than six feet.
- MM-PA-4: Paleontological Resources Collection. Because some fossils are small, it will
  be necessary to collect sediment samples of promising horizons discovered during grading
  or excavation monitoring for processing through fine mesh screens. Once the samples have
  been screened, they shall be examined microscopically for small fossils.
- **MM-PA-5: Fossil Preparation.** Fossils shall be prepared to the point of identification and catalogued before they are donated to their final repository.
- MM-PA-6: Fossil Donation. All fossils collected shall be donated to a public, nonprofit institution with a research interest in the materials, such as the Los Angeles County Museum of Natural History.
- MM-PA-7: Paleontological Reporting. A report detailing the results of these efforts, listing the fossils collected, and naming the repository shall be submitted to the lead agency at the completion of the project.
- MM-Historic/Architectural and Archaeological/Cultural Resources (HA)-1: Historic American Buildings Survey (HABS) Document. For historic properties eligible at the federal, state or local levels that are proposed for demolition or partial demolition (i.e., the International Airport Industrial District), a Historic American Buildings Survey (HABS) document shall be prepared by LAWA in accordance with the Secretary of the Interior's Guidelines for Architectural and Engineering Documentation Standards. documentation (I, II, III) shall be determined by the National Park Service (NPS). Documentation shall adequately explicate and illustrate what is significant or valuable about each of the historic resources. Documentation data shall be collected prior to commencement of demolition of the buildings. Archival copies of the recordation document shall be submitted to the National Park Service, Library of Congress, and the California Office of Historic Preservation. Non-archival copies of the document shall be distributed to the City of Los Angeles Planning Department, City of Los Angeles Cultural Affairs Department, Los Angeles Public Library (main branch), Los Angeles Conservancy, and LAWA's Public Relations Division.
- MM-HA-2: Historic Educational Materials. For the significant historic resources proposed for demolition or partial demolition, educational materials suitable for the general public, secondary school use, and/or aviation historians and enthusiasts shall be designed with the assistance of a qualified historic preservation professional and implemented by LAWA. The purpose of these materials shall be to present in two- or three-dimensional format, the history of the airport and surrounding area. Such materials shall include, but not be limited to, a video/film documentary, curriculum program and teacher's guide, architectural models,

- and a historical brochure or pamphlet. These materials shall be made available via LAWA's public relations department to the general public, local community school history programs, and related interest groups.
- MM-HA-4: Discovery. The FAA shall prepare an archaeological treatment plan (ATP), in consultation with SHPO, that ensures the long-term protection and proper treatment of those unexpected archaeological discoveries of federal, state, and/or local significance found within the APE of the selected alternative. The ATP shall include a monitoring plan, research design, and data recovery plan. The ATP shall be consistent with the Secretary of the Interior's Standards and Guidelines for Archaeological Documentation; California Office of Historic Preservation's (OHP) Archaeological Resources Management Report; Recommended Contents and Format (1989), and the Guidelines for Archaeological Research Design (1991); and shall also take into account the ACHP's publication Treatment of Archaeological Properties: A Handbook. The ATP shall also be consistent with the Department of the Interior's Guidelines for Federal Agency Responsibility under Section 110 of the NHPA. In addition, those steps outlined in Section 21083.2(i) of CEQA and Section 15064.5(f) of the CEQA Guidelines shall be implemented, as necessary.
- MM-HA-5: Monitoring. Any grading and excavation activities within LAX proper or the acquisition areas that have not been identified as containing redeposited fill material or having been previously disturbed shall be monitored by a qualified archaeologist. The archaeologist shall be retained by LAWA and shall meet the Secretary of the Interior's Professional Qualifications Standards. The project archaeologist shall be empowered to halt construction activities in the immediate area if potentially significant resources are identified. Test excavations may be necessary to reveal whether such findings are significant or insignificant. In the event of notification by the project archaeologist that a potentially significant or unique archaeological/cultural find has been unearthed, LAWA shall be notified and grading operations shall cease immediately in the affected area until the geographic extent and scientific value of the resource can be reasonably verified. Upon discovery of an archaeological resource or Native American remains, LAWA shall retain a Native American monitor from a list of suitable candidates obtained from the Native American Heritage Commission.
- **MM-HA-6: Excavation and Recovery.** Any excavation and recovery of identified resources (features) shall be performed using standard archaeological techniques and the requirements stipulated in the ATP. Any excavations, testing, and/or recovery of resources shall be conducted by a qualified archaeologist selected by LAWA.
- MM-HA-7: Administration. Where known resources are present, all grading and construction plans shall be clearly imprinted with all of the archaeological/cultural mitigation measures. All site workers shall be informed in writing by the on-site archaeologist of the restrictions regarding disturbance and removal as well as procedures to follow should a resource deposit be detected. Where known resources are present, all grading and construction plans shall be clearly imprinted with all of the archaeological and cultural mitigation measures. All site workers shall be informed in writing by the on-site archaeologist of the restrictions regarding disturbance and removal as well as procedures to follow should a resource deposit be detected.
- MM-HA-8: Archaeological/Cultural Monitor Report. Upon completion of grading and excavation activities in the vicinity of known archaeological resources, the Archaeological/Cultural monitor shall prepare a written report. The report shall include the results of the fieldwork and all appropriate laboratory and analytical studies that were

performed in conjunction with the excavation. The report shall be submitted in draft form to the FAA, LAWA and City of Los Angeles-Cultural Affairs Department. City representatives shall have 30 days to comment on the report. All comments and concerns shall be addressed in a final report issued within 30 days of receipt of city comments.

- MM-HA-9: Artifact Curation. All artifacts, notes, photographs, and other project-related materials recovered during the monitoring program shall be curated at a facility meeting federal and state standards.
- MM-HA-10: Archaeological Notification. If human remains are found, all grading and excavation activities in the vicinity shall cease immediately and the appropriate LAWA authority shall be notified: compliance with those procedures outlined in Section 7050.5(b) and (c) of the State Health and Safety Code, Section 5097.94(k) and (i) and Section 5097.98(a) and (b) of the Public Resources Code shall be required. In addition, those steps outlined in Section 15064.5(e) of the CEQA Guidelines shall be implemented.

# 4.4.3.3.2 **Project Design Features**

The proposed Project does not include specific design features related to cultural resources. Best Management Practices and LAX Master Plan EIS/EIR mitigation commitments will be incorporated into the construction guidelines of the proposed Project, including those related to minimizing impacts to cultural resources.

# 4.4.3.4 Project Impacts

# 4.4.3.4.1 <u>Paleontological Resources</u>

#### Construction

#### **LAX Northside Center District**

**Figure 4.4-9** shows the soil characteristics of the LAX Northside Center District as it relates to the potential for discovering unknown paleontological resources.

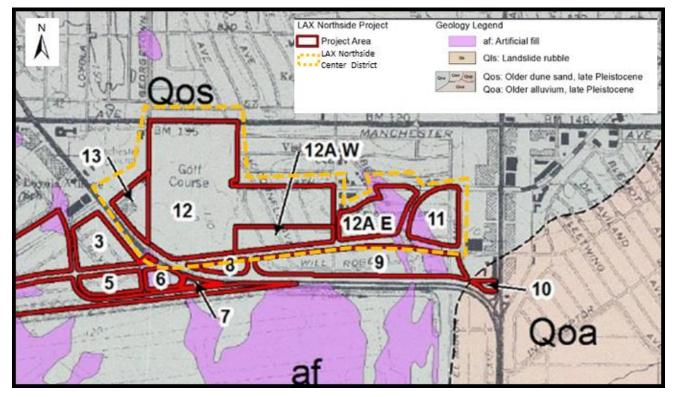


Figure 4.4-9 - Project Site Geology - LAX Northside Center District

Source: Cogstone, 2012.

#### Area 11

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site in Area 11. Therefore, the proposed Project would have no construction impacts related to previously-identified paleontological resources in Area 11.

Construction of buildings and parking as well as landscaping within Area 11 would require excavation and grading activities that would remove approximately 6,800 cubic yards (cu.yd.) of soil. The excavation also includes a proposed underground parking garage which would require excavation down to approximately 22 feet. As shown in **Figure 4.4-9**, the southwestern portion of Area 11 contains artificial fill. While this fill may contain paleontological resources, they would have been brought from a different site and have lost their scientific significance. Part of the proposed development in Area 11, including the proposed underground garage, would be located in an area that is characterized by Quaternary dune sand, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources in Area 11 would be less than significant.

### Area 12A East

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site in Area 12A East. Therefore, the proposed Project would have no construction impacts related to previously-identified paleontological resources in Area 12A East.

Construction of buildings and parking as well as landscaping within Area 12A East (excluding the existing LAFD Station Number 5 whose site would not be modified under the proposed Project)would require excavation and grading activities that would remove approximately 7,100 cu.yd. of soil. As shown in **Figure 4.4-9**, the central and northern portions of Area 12A East contain artificial fill. While this fill may contain paleontological resources, they would have been brought from a different site and have lost their scientific significance. Part of the proposed development within Area 12A East would be located in an area that is characterized by Quaternary dune sand, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources in Area 12A East would be less than significant.

#### Area 12A West

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site in Area 12A West. Therefore, the proposed Project would have no construction impacts related to previously-identified paleontological resources in Area 12A West.

Construction of buildings and parking as well as landscaping within Area 12A West would require excavation and grading activities that would remove approximately 19,500 cu.yd. of soil. As shown in **Figure 4.4-9**, all of Area 12A West is characterized by Quaternary dune sand, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources in Area 12A West would be less than significant.

#### Area 12B

Area 12B contains the existing Westchester Golf Course. There are no known paleontological resources in Area 12B and there are no proposed construction activities in Area 12B under the proposed Project. Consequently, there would be no potential to affect unknown paleontological resources. Therefore, construction impacts related to known or unknown paleontological resources in Area 12B would not occur.

### Area 13

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site in Area 13. Therefore, the proposed Project would have no construction impacts related to previously-identified paleontological resources in Area 13.

Construction of buildings and parking as well as landscaping within Area 13 (excluding the existing First Flight Child Development Center whose site would not be modified under the proposed Project) would require excavation and grading activities that would remove approximately 18 cu.yd. of soil. As shown in **Figure 4.4-9**, all of Area 13 is characterized by Quaternary dune sand, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources in Area 13 would be less than significant.

### **LAX Northside Campus District**

**Figure 4.4-10** shows the soil characteristics of the LAX Northside Campus District as it relates to the potential for discovering unknown paleontological resources.

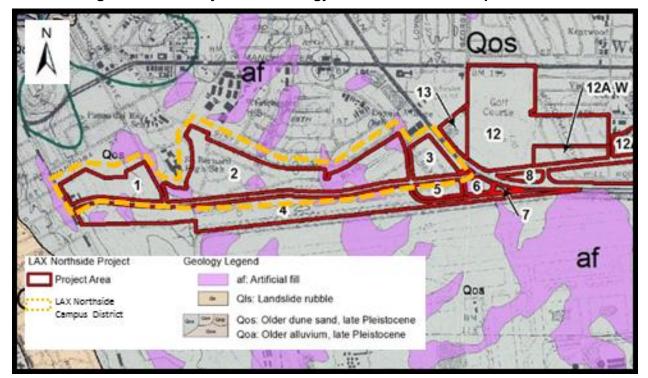


Figure 4.4-10 - Project Site Geology - LAX Northside Campus District

Source: Cogstone, 2012.

### Area 1

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site in Area 1. Therefore, the proposed Project would have no construction impacts related to previously-identified paleontological resources in Area

Construction of buildings and parking as well as landscaping associated with the recreational land uses within Area 1 (excluding the existing Jet Pets Animal Quarantine Facility whose site would not be modified under the proposed Project) would require excavation and grading activities. In addition, should the City of Los Angeles Department of Public Works, Bureau of Sanitation (BOS) detention basin and drainage project be built on Area 1, there would be extensive excavation activities at that location. As shown in **Figure 4.4-10**, all of Area 1 is characterized by Quaternary dune sand, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources in Area 1 would be less than significant.

#### Area 2

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site in Area 2. Therefore, the proposed Project would

have no construction impacts related to previously-identified paleontological resources in Area 2.

Construction of buildings and parking as well as landscaping within Area 2 would require excavation and grading activities that would remove a total of approximately 393,700 cu.yd. of soil. As shown in **Figure 4.4-10**, several portions of Area 2 contain artificial fill. While this fill may contain paleontological resources, they would have been brought from a different site and have lost their scientific significance. The majority of the proposed development in Area 2, would be located in areas that are characterized by Quaternary dune sand, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources in Area 2 would be less than significant.

#### Area 3

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site in Area 3. Therefore, the proposed Project would have no construction impacts related to previously-identified paleontological resources in Area 3.

Construction of buildings and parking as well as landscaping within Area 3 would require excavation and grading activities that would remove approximately 5,900 cu.yd. of soil. As shown in **Figure 4.4-10**, all of Area 3 is characterized by Quaternary dune sand, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources in Area 3 would be less than significant.

### **LAX Northside Airport Support District**

**Figure 4.4-11** shows the soil characteristics of the LAX Northside Airport Support District as it relates to the potential for discovering unknown paleontological resources.

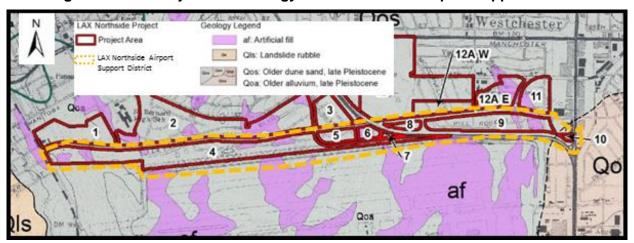


Figure 4.4-11 - Project Site Geology – LAX Northside Airport Support District

Source: Cogstone, 2012.

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site in Area 4. Therefore, the proposed Project would have no construction impacts related to previously-identified paleontological resources in Area 4.

Construction of structures and parking as well as landscaping within Area 4 would require excavation and grading activities that would remove approximately 66,300 cubic yards (cu.yd.) of soil. As shown in **Figure 4.4-11**, several portions of Area 4 contain artificial fill. While this fill may contain paleontological resources, they would have been brought from a different site and have lost their scientific significance. The majority of the proposed development in Area 4 would be located in an area that is characterized by Quaternary dune sand, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources in Area 4 would be less than significant.

#### Area 5

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site in Area 5. Therefore, the proposed Project would have no construction impacts related to previously-identified paleontological resources in Area 5.

There are no building structures that would be constructed in Area 5. Proposed re-landscaping in Area 5 would require minimal excavation and grading which is not anticipated to be deeper than 1 to 2 feet. Nevertheless, as shown in **Figure 4.4-11**, all of Area 5 is characterized by Quaternary dune sand, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources in Area 5 would be less than significant.

#### Area 6

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site in Area 6. Therefore, the proposed Project would have no construction impacts related to previously-identified paleontological resources in Area 6.

There are no building structures that would be constructed in Area 6. The existing electrical substation would remain in place and no construction activities would occur at its site. Proposed re-landscaping in Area 6 would require minimal excavation and grading which is not anticipated to be deeper than 1 to 2 feet. As shown in **Figure 4.4-11**, most of Area 6 is characterized by artificial fill, which may contain paleontological resources, but as they would have been brought from a different site, they would have lost their scientific significance. Nevertheless, there is a portion of Area 6 which is characterized as Quaternary dune sand, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources in Area 6 would be less than significant.

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site in Area 7. Therefore, the proposed Project would have no construction impacts related to previously-identified paleontological resources in Area 7.

There are no building structures that would be constructed in Area 7. Proposed re-landscaping in Area 7 would require minimal excavation and grading which is not anticipated to be deeper than 1 to 2 feet. Nevertheless, as shown in **Figure 4.4-11**, all of Area 7 is characterized by Quaternary dune sand, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources in Area 7 would be less than significant.

### Area 8

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site in Area 8. Therefore, the proposed Project would have no construction impacts related to previously-identified paleontological resources in Area 8.

There are no building structures that would be constructed in Area 8. Proposed re-landscaping in Area 8 would require minimal excavation and grading which is not anticipated to be deeper than 1 to 2 feet. Nevertheless, as shown in **Figure 4.4-11**, all of Area 8 is characterized by Quaternary dune sand, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources in Area 8 would be less than significant.

#### Area 9

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site in Area 9. Therefore, the proposed Project would have no construction impacts related to previously-identified paleontological resources in Area 9.

There are no building structures that would be constructed in Area 9. The existing radar facility would remain in place and no construction activities would occur at its site. Proposed relandscaping in Area 9 would require minimal excavation and grading which is not anticipated to be deeper than 1 to 2 feet. As shown in **Figure 4.4-11**, a portion of the eastern part of Area 9 is characterized by artificial fill, which may contain paleontological resources, but as they would have been brought from a different site, they would have lost their scientific significance. Nevertheless, the majority of Area 9 is characterized as Quaternary dune sand, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources in Area 9 would be less than significant.

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site in Area 10. Therefore, the proposed Project would have no construction impacts related to previously-identified paleontological resources in Area 10.

There are no building structures that would be constructed in Area 10. Proposed relandscaping in Area 10 would require minimal excavation and grading which is not anticipated to be deeper than 1 to 2 feet. Nevertheless, as shown in **Figure 4.4-11**, all of Area 10 is characterized by Quaternary alluvial deposit, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources in Area 10 would be less than significant.

# **Operations**

### **LAX Northside Center District**

The LAX Northside Center District does not contain known fossil deposits. Impacts to unknown paleontological resources typically occur during excavation activities, which typically occur during construction. Any additional excavation activities that would occur during operations would be minor and not as deep as those required to install foundations or subterranean parking. Any major site excavation activities would require their own CEQA clearance to determine impact significance to paleontological resources. Therefore, operational impacts related to paleontological resources in Areas 11, 12A East, 12A West, and 13 would be less than significant.

As there are no operational changes to the existing Westchester Golf Course under the proposed Project, operational impacts related to paleontological resources in Area 12B would not occur.

#### **LAX Northside Campus District**

The LAX Northside Campus District does not contain known fossil deposits. Impacts to unknown paleontological resources typically occur during excavation activities, which typically occur during construction. Any additional excavation activities that would occur during operations would be minor and not as deep as those required to install foundations or subterranean parking. In addition, should the City of Los Angeles Department of Public Works, Bureau of Sanitation (BOS) detention basin and drainage project be built on Area 1, there would be extensive excavation activities at that location. Any major site excavation activities would require their own CEQA clearance to determine impact significance to paleontological resources. Therefore, operational impacts related to paleontological resources in Areas 1, 2, and 3 would be less than significant.

#### **LAX Northside Airport Support District**

The LAX Northside Airport Support District does not contain known fossil deposits. Impacts to unknown paleontological resources typically occur during excavation activities, which typically occur during construction. Any additional excavation activities that would occur during operations would be minor and not as deep as those required to install foundations or subterranean parking. Any major site excavation activities would require their own CEQA clearance to determine impact significance to paleontological resources. Therefore, operational

impacts related to paleontological resources in Areas 4, 5, 6, 7, 8, 9, and 10 would be less than significant.

# **Cumulative Impacts**

# **LAX Northside Center District**

The LAX Northside Center District does not contain known fossil deposits. Impacts to unknown paleontological resources typically occur during excavation activities, which typically occur during construction. As excavation and grading activities are typically localized, direct impacts to paleontological resources are also typically localized. Furthermore, any potential impacts to unknown paleontological resources would be mitigated by LAX Master Plan EIR/EIS Commitments PA-1 through PA-7. Therefore, the proposed Project would not contribute cumulatively to impacts to paleontological resources.

### **LAX Northside Campus District**

The LAX Northside Campus District does not contain known fossil deposits. Impacts to unknown paleontological resources typically occur during excavation activities, which typically occur during construction. As excavation and grading activities are typically localized, direct impacts to paleontological resources are also typically localized. Furthermore, any potential impacts to unknown paleontological resources would be mitigated by LAX Master Plan EIR/EIS Commitments PA-1 through PA-7. Therefore, the proposed Project would not contribute cumulatively to impacts to paleontological resources.

## **LAX Northside Airport Support District**

The LAX Northside Airport Support District does not contain known fossil deposits. Impacts to unknown paleontological resources typically occur during excavation activities, which typically occur during construction. As excavation and grading activities are typically localized, direct impacts to paleontological resources are also typically localized. Furthermore, any potential impacts to unknown paleontological resources would be mitigated by LAX Master Plan EIR/EIS Commitments PA-1 through PA-7. Therefore, the proposed Project would not contribute cumulatively to impacts to paleontological resources.

# 4.4.3.4.2 <u>Archaeological Resources</u>

#### Construction

### **LAX Northside Center District**

### Area 11

No archaeological resources were identified as NRHP, CRHR, or local register-eligible or –listed within the Area 11 as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 11.

Construction of buildings and parking as well as landscaping within Area 11 would require excavation and grading activities that would remove approximately 6,800 cubic yards (cu.yd.) of soil. The excavation also includes a proposed underground parking garage which would require excavation down to approximately 22 feet. As shown in **Figure 4.4-9**, the southwestern portion of Area 11 contains artificial fill. While this fill may contain archaeological resources, they would have been brought from a different site and have lost their scientific significance. Part of the

proposed development in Area 11, including the proposed underground garage, would be located in areas that are not artificial fill, which means that there exists the potential for discovery of unknown archaeological resources, given the pre-history and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources in Area 11 would be less than significant.

#### Area 12A East

No archaeological resources were identified as NRHP, CRHR, or local register-eligible or –listed within the Area 12A East as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 12A East.

Construction of buildings and parking as well as landscaping within Area 12A East (excluding the existing LAFD Station Number 5 whose site would not be modified under the proposed Project) would require excavation and grading activities that would remove approximately 7,100 cu.yd. of soil. As shown in **Figure 4.4-9**, the central and northern portions of Area 12A East contain artificial fill. While this fill may contain archaeological resources, they would have been brought from a different site and have lost their scientific significance. Part of the proposed development in Area 12A East would be located in areas that are not artificial fill, which means that there exists the potential for discovery of unknown archaeological resources, given the prehistory and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources in Area 12A East would be less than significant.

#### Area 12A West

No archaeological resources were identified as NRHP, CRHR, or local register-eligible or –listed within the Area 12A West as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 12A West.

Construction of buildings and parking as well as landscaping within Area 12A West would require excavation and grading activities that would remove approximately 19,500 cu.yd. of soil. As shown in **Figure 4.4-9**, Area 12A West does not contain artificial fill, which means that there exists the potential for discovery of unknown archaeological resources, given the pre-history and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources in Area 12A West would be less than significant.

#### Area 12B

One archaeological site, 19-001118, is located within Area 12B. 19-001118 was not identified as NRHP, CRHR, or local register-eligible or -listed as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 12B.

Area 12B contains the existing Westchester Golf Course. There are no proposed construction activities in Area 12B under the proposed Project and, consequently, there would be no potential to affect unknown archaeological resources. Therefore, construction impacts related to unknown archaeological resources in Area 12B would not occur.

No archaeological resources were identified as NRHP, CRHR, or local register-eligible or –listed within the Area 13 as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 13.

Construction of buildings and parking as well as landscaping within Area 13 (excluding the existing First Flight Child Development Center whose site would not be modified under the proposed Project) would require excavation and grading activities that would remove approximately 18 cu.yd. of soil. As shown in **Figure 4.4-9**, Area 13 does not contain artificial fill, and there exists the potential for discovery of unknown archaeological resources, given the prehistory and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources in Area 13 would be less than significant.

## **LAX Northside Campus District**

#### Area 1

No archaeological resources were identified as NRHP, CRHR, or local register-eligible or –listed within the Area 1 as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 1.

Construction of buildings and parking as well as landscaping associated with the recreational land uses within Area 1 (excluding the existing Jet Pets Animal Quarantine Facility whose site would not be modified under the proposed Project) would require excavation and grading activities. In addition, should the City of Los Angeles Department of Public Works, BOS detention basin and drainage project be built on Area 1, there would be extensive excavation activities at that location. As shown in **Figure 4.4-10**, Area 1 does not contain artificial fill, which means that there exists the potential for discovery of unknown archaeological resources, given the pre-history and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources in Area 1 would be less than significant.

#### Area 2

No archaeological resources were identified as NRHP, CRHR, or local register-eligible or –listed within the Area 2 as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 2.

Construction of buildings and parking as well as landscaping within Area 2 would require excavation and grading activities that would remove a total of approximately 393,700 cubic yards (cu.yd.) of soil. As shown in **Figure 4.4-10**, several portions of Area 2 contain artificial fill. While this fill may contain archaeological resources, they would have been brought from a different site and have lost their scientific significance. The majority of the proposed development in Area 2 would be located in areas that do not contain artificial fill, which means that there exists the potential for discovery of unknown archaeological resources, given the prehistory and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources in Area 2 would be less than significant.

No archaeological resources were identified as NRHP, CRHR, or local register-eligible or –listed within the Area 3 as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 3.

Construction of buildings and parking as well as landscaping within Area 3 would require excavation and grading activities that would remove approximately 5,900 cu.yd. of soil. As shown in **Figure 4.4-10**, Area 3 does not contain artificial fill, which means that there exists the potential for discovery of unknown archaeological resources, given the pre-history and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources in Area 3 would be less than significant.

### **LAX Northside Airport Support District**

#### Area 4

No archaeological resources were identified as NRHP, CRHR, or local register-eligible or –listed within the Area 4 as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 4.

Construction of structures and parking as well as landscaping within Area 4 would require excavation and grading activities that would remove approximately 66,300 cubic yards (cu.yd.) of soil. As shown in **Figure 4.4-11**, several portions of Area 4 contain artificial fill. While this fill may contain archaeological resources, they would have been brought from a different site and have lost their scientific significance. The majority of the proposed development in Area 4 would be located in an area that does not contain artificial fill, which means that there exists the potential for discovery of unknown archaeological resources, given the pre-history and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources in Area 4 would be less than significant.

#### Area 5

No archaeological resources were identified as NRHP, CRHR, or local register-eligible or –listed within the Area 5 as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 5.

There are no building structures that would be constructed in Area 5. Proposed re-landscaping in Area 5 would require minimal excavation and grading which is not anticipated to be deeper than 1 to 2 feet. Nevertheless, as shown in **Figure 4.4-11**, Area 5 does not contain artificial fill, which means that there exists the potential for discovery of unknown archaeological resources, given the pre-history and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources in Area 5 would be less than significant.

#### Area 6

No archaeological resources were identified as NRHP, CRHR, or local register-eligible or –listed within the Area 6 as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 6.

There are no building structures that would be constructed in Area 6. The existing electrical substation would remain in place and no construction activities would occur at its site. Proposed re-landscaping in Area 6 would require minimal excavation and grading which is not anticipated to be deeper than 1 to 2 feet. As shown in **Figure 4.4-11**, most of Area 6 is characterized by artificial fill, which may contain archaeological resources, but as they would have been brought from a different site, they would have lost their scientific significance. Nevertheless, there is a portion of Area 6 that does not contain artificial fill, which means that there exists the potential for discovery of unknown archaeological resources, given the prehistory and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources in Area 6 would be less than significant.

#### Area 7

No archaeological resources were identified as NRHP, CRHR, or local register-eligible or –listed within the Area 7 as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 7.

There are no building structures that would be constructed in Area 7. Proposed re-landscaping in Area 7 would require minimal excavation and grading which is not anticipated to be deeper than 1 to 2 feet. Nevertheless, as shown in **Figure 4.4-11**, Area 7 does not contain artificial fill, which means that there exists the potential for discovery of unknown archaeological resources, given the pre-history and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources in Area 7 would be less than significant.

#### Area 8

No archaeological resources were identified as NRHP, CRHR, or local register-eligible or –listed within the Area 8 as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 8.

There are no building structures that would be constructed in Area 8. Proposed re-landscaping in Area 8 would require minimal excavation and grading which is not anticipated to be deeper than 1 to 2 feet. Nevertheless, as shown in **Figure 4.4-11**, Area 8 does not contain artificial fill, which means that there exists the potential for discovery of unknown archaeological resources, given the pre-history and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources in Area 8 would be less than significant.

#### Area 9

No archaeological resources were identified as NRHP, CRHR, or local register-eligible or –listed within the Area 9 as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 9.

There are no building structures that would be constructed in Area 9. The existing radar facility would remain in place and no construction activities would occur at its site. Proposed relandscaping in Area 9 would require minimal excavation and grading which is not anticipated to be deeper than 1 to 2 feet. As shown in **Figure 4.4-11**, a portion of the eastern part of Area 9 is characterized by artificial fill, which may contain archaeological resources, but as they would have been brought from a different site, they would have lost their scientific significance.

### 4.4 Cultural Resources

Nevertheless, the majority of Area 9 does not contain artificial fill, which means that there exists the potential for discovery of unknown archaeological resources, given the pre-history and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources in Area 9 would be less than significant.

#### Area 10

No archaeological resources were identified as NRHP, CRHR, or local register-eligible or –listed within the Area 10 as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant in Area 10

There are no building structures that would be constructed in Area 10. Proposed relandscaping in Area 10 would require minimal excavation and grading which is not anticipated to be deeper than 1 to 2 feet. As shown in **Figure 4.4-11**, Area 10 does not contain artificial fill, which means that there exists the potential for discovery of unknown archaeological resources, given the pre-history and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources in Area 10 would be less than significant.

# **Operations**

### **LAX Northside Center District**

One known archaeological site is known in the LAX Northside Center District in Area 12B, but this area would not be developed under the proposed Project. Impacts to unknown archaeological resources typically occur during excavation activities, which typically occur during construction. Any additional excavation activities that would occur during operations would be minor and not as deep as those required to install foundations or subterranean parking. Any excavation activity would be required to comply with the LAX Master Plan EIS/EIR Commitments and any major site excavation activities would require their own CEQA clearance to determine impact significance to archaeological resources. Therefore, operational impacts related to paleontological resources in Areas 11, 12A East, 12A West, and 13 would be less than significant.

As there are no operational changes to the existing Westchester Golf Course under the proposed Project, operational impacts related to archaeological resources in Area 12B would not occur.

# **LAX Northside Campus District**

The Northside Campus District does not contain known archaeological resources. Impacts to unknown archaeological resources typically occur during excavation activities, which typically occur during construction. Any additional excavation activities that would occur during operations would be minor and not as deep as those required to install foundations or subterranean parking. Any excavation activity would be required to comply with the LAX Master Plan EIS/EIR Commitments and any major site excavation activities would require their own CEQA clearance to determine impact significance to archaeological resources. Therefore, operational impacts related to paleontological resources in Areas 1, 2, and 3 would be less than significant.

## **LAX Northside Airport Support District**

The Northside Airport Support District does not contain known archaeological resources. Impacts to unknown archaeological resources typically occur during excavation activities, which typically occur during construction. Any additional excavation activities that would occur during operations would be minor and not as deep as those required to install foundations or subterranean parking. Any excavation activity would be required to comply with the LAX Master Plan EIS/EIR Commitments and any major site excavation activities would require their own CEQA clearance to determine impact significance to archaeological resources. Therefore, operational impacts related to paleontological resources in Areas 4, 5, 6, 7, 8, 9, and 10 would be less than significant.

# **Cumulative Impacts**

## **LAX Northside Center District**

One known archaeological site is known in the LAX Northside Center District in Area 12B, but this area would not be developed under the proposed Project. Impacts to unknown archaeological resources typically occur during excavation activities, which typically occur during construction. As excavation and grading activities are typically localized, direct impacts to archaeological resources are also typically localized. Furthermore, any potential impacts to unknown archaeological resources would be mitigated by LAX Master Plan EIR/EIS Commitments HA-4 through HA-10. Therefore, the proposed Project would not contribute cumulatively to impacts to archaeological resources.

## **LAX Northside Campus District**

The Northside Campus District does not contain known archaeological resources. Impacts to unknown archaeological resources typically occur during excavation activities, which typically occur during construction. As excavation and grading activities are typically localized, direct impacts to archaeological resources are also typically localized. Furthermore, any potential impacts to unknown archaeological resources would be mitigated by LAX Master Plan EIR/EIS Commitments HA-4 through HA-10. Therefore, the proposed Project would not contribute cumulatively to impacts to archaeological resources.

### **LAX Northside Airport Support District**

The Northside Airport Support District does not contain known archaeological resources. Impacts to unknown archaeological resources typically occur during excavation activities, which typically occur during construction. As excavation and grading activities are typically localized, direct impacts to archaeological resources are also typically localized. Furthermore, any potential impacts to unknown archaeological resources would be mitigated by LAX Master Plan EIR/EIS Commitments HA-4 through HA-10. Therefore, the proposed Project would not contribute cumulatively to impacts to archaeological resources.

# 4.4.3.4.3 <u>Historic Architectural Resources</u>

### Construction

### **LAX Northside Campus District**

#### Area 11

Area 11 is currently used as a construction staging area but it does not contain permanent structures that would require evaluation of historic resources and, thus, would not be considered historical resources for the purposes of CEQA. Construction activities that would occur within Area 11 would be restricted to the Project site, and would not directly or indirectly affect any known historical resources in the vicinity of the Project site. Therefore, construction impacts related to historic architectural resources in Area 11 would not occur.

#### Area 12A East

Area 12A East contains LAFD Station Number 5 which does not meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Construction activities that would occur within Area 12A East would be restricted to the Project site, and would not directly or indirectly affect any known historic architectural resources in the vicinity of the Project site, nor would it occur within the existing site of the LAFD Station Number 5. Therefore, construction impacts related to historic architectural resources in Area 12A East would not occur.

#### Area 12A West

Area 12A West does not contain permanent structures that would require evaluation of historic resources and, thus, would not be considered historical resources for the purposes of CEQA. Construction activities that would occur within Area 12A West would be restricted to the Project site, and would not directly or indirectly affect any known historical resources in the vicinity of the Project site. Therefore, construction impacts related to historic architectural resources in Area 12A West would not occur.

#### Area 12B

Area 12 B contains the Westchester Golf Course which does not meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Additionally, the proposed Project would not include construction activities within Area 12B. Therefore, construction impacts related to historic architectural resources in Area 12B would not occur.

#### Area 13

Area 13 contains the First Flight Child Development Center which does not meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Construction activities that would occur within Area 13 would be restricted to the Project site, and would not directly or indirectly affect any known historic architectural resources in the vicinity of the Project site, nor would it occur within the existing site of the First Flight Child Development Center. Therefore, construction impacts related to historic architectural resources in Area 13 would not occur.

### **LAX Northside Center District**

### Area 1

Area 1 contains the Jet Pets Animal Quarantine Facility which does not meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Construction activities that would occur within Area 1 would be restricted to the Project site, and would not directly or indirectly affect any known historic architectural resources in the vicinity of the Project site, nor would it occur within the existing site of the Jet Pets Animal Quarantine Facility. Therefore, construction impacts related to historic architectural resources in Area 1 would not occur.

#### Area 2

Area 2 does not contain permanent structures that would require evaluation of historic resources and, thus, would not be considered historical resources for the purposes of CEQA. Construction activities that would occur within Area 2 would be restricted to the Project site, and would not directly or indirectly affect any known historical resources in the vicinity of the Project site. Therefore, construction impacts related to historic architectural resources in Area 2 would not occur.

#### Area 3

Area 3 does not contain permanent structures that would require evaluation of historic resources and, thus, would not be considered historical resources for the purposes of CEQA. Construction activities that would occur within Area 3 would be restricted to the Project site, and would not directly or indirectly affect any known historical resources in the vicinity of the Project site. Therefore, construction impacts related to historic architectural resources in Area 3 would not occur.

### **Airport Support District**

#### Area 4

A portion of Area 4 is currently used as a construction staging area but it does not contain permanent structures that would require evaluation of historic resources and, thus, would not be considered historical resources for the purposes of CEQA. Construction activities that would occur within Area 4 would be restricted to the Project site, and would not directly or indirectly affect any known historical resources in the vicinity of the Project site. Therefore, construction impacts related to historic architectural resources in Area 4 would not occur.

#### Area 5

Area 5 does not contain permanent structures that would require evaluation of historic resources and, thus, would not be considered historical resources for the purposes of CEQA. Construction activities that would occur within Area 5 would be restricted to the Project site, and would not directly or indirectly affect any known historical resources in the vicinity of the Project site. Therefore, construction impacts related to historic architectural resources in Area 5 would not occur.

#### Area 6

Area 6 is mostly vacant, but it contains an electrical substation which does not meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Construction activities that would occur within Area 6 would be restricted to the Project site, and would not directly or indirectly affect any known historic architectural resources in the

### 4.4 Cultural Resources

vicinity of the Project site, nor would it occur within the existing site of the electrical substation. Therefore, construction impacts related to historic architectural resources in Area 6 would not occur.

#### Area 7

Area 7 does not contain permanent structures that would require evaluation of historic resources and, thus, would not be considered historical resources for the purposes of CEQA. Construction activities that would occur within Area 7 would be restricted to the Project site, and would not directly or indirectly affect any known historical resources in the vicinity of the Project site. Therefore, construction impacts related to historic architectural resources in Area 7 would not occur.

#### Area 8

Area 8 does not contain permanent structures that would require evaluation of historic resources and, thus, would not be considered historical resources for the purposes of CEQA. Construction activities that would occur within Area 8 would be restricted to the Project site, and would not directly or indirectly affect any known historical resources in the vicinity of the Project site. Therefore, construction impacts related to historic architectural resources in Area 8 would not occur.

#### Area 9

Area 9 contains a radar facility which does not meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Construction activities that would occur within Area 9 would be restricted to the Project site, and would not directly or indirectly affect any known historic architectural resources in the vicinity of the Project site, nor would it occur within the existing site of the radar facility. Therefore, construction impacts related to historic architectural resources in Area 9 would not occur.

#### Area 10

Area 10 does not contain permanent structures that would require evaluation of historic resources and, thus, would not be considered historical resources for the purposes of CEQA. Construction activities that would occur within Area 10 would be restricted to the Project site, and would not directly or indirectly affect any known historical resources in the vicinity of the Project site. Therefore, construction impacts related to historic architectural resources in Area 10 would not occur.

# **Operations**

### **LAX Northside Center District**

#### Areas 11 and 12A West

Areas 11 and 12A West do not contain permanent structures that would require evaluation of historic resources and, thus, would not be considered historical resources for the purposes of CEQA. Consequently, any development allowable within either of these two areas under the proposed LAX Northside Design Guidelines and Standards would not result in conflict with onsite structures. Therefore, operational impacts related to historic architectural resources in Areas 11 and 12A West would not occur.

The proposed LAX Northside Design Guidelines and Standards contain architectural and landscape guidelines to integrate the proposed development into the community. These guidelines will ensure that the proposed development in Areas 11 and 12A West does not have

the potential to contrast to historic properties in the vicinity of the Project site by restricting heights, using similar materials as surrounding development, and using similar color schemes as the surrounding development. Therefore, indirect operational impacts related to off-site historic architectural resources in Areas 11 and 12A West would be less than significant.

#### Area 12A East

Area 12A East contains LAFD Station Number 5, which does not meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Additionally, the development in Area 12A East under the proposed Project (mixed commercial use; community and civic) would be compatible with the existing LAFD Station Number 5 and would not encroach onto its site. Therefore, operational impacts related to on-site historic architectural resources in Area 12A East would not occur.

The proposed LAX Northside Design Guidelines and Standards contain architectural and landscape guidelines to integrate the proposed development into the community. These guidelines will ensure that the proposed development in Area 12A East does not have the potential to contrast to historic properties in the vicinity of the Project site by restricting heights, using similar materials as surrounding development, and using similar color schemes as the surrounding development. Therefore, indirect operational impacts related to off-site historic architectural resources in Area 12A East would be less than significant.

#### Area 12B

Area 12B contains the Westchester Golf Course, which does not meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Additionally, the development in the areas adjacent to Area 12B under the proposed Project (mixed commercial; community and civic) would be compatible with the existing Westchester Golf Course and would not encroach onto the existing structures within Area 12B. Therefore, operational impacts related to historic architectural resources in Area 12B would not occur.

#### Area 13

Area 13 contains the First Flight Child Development Center, which does not meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Additionally, the development in Area 13 under the proposed Project (community and civic) would be compatible with the existing First Flight Child Development Center and would not encroach onto its site. Therefore, operational impacts related to on-site historic architectural resources in Area 13 would not occur.

The proposed LAX Northside Design Guidelines and Standards contain architectural and landscape guidelines to integrate the proposed development into the community. These guidelines will ensure that the proposed development in Area 13 does not have the potential to contrast to historic properties in the vicinity of the Project site by restricting heights, using similar materials as surrounding development, and using similar color schemes as the surrounding development. Therefore, indirect operational impacts related to off-site historic architectural resources in Area 13 would be less than significant.

### **LAX Northside Campus District**

### Area 1

Area 1 contains the Jet Pets Animal Quarantine Facility, which does not meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Additionally, the development in Area 1 under the proposed Project (community and civic) would

### 4.4 Cultural Resources

be compatible with the existing Jet Pets Animal Quarantine Facility and would not encroach onto its site. Therefore, operational impacts related to on-site historic architectural resources in Area 1 would not occur.

The proposed LAX Northside Design Guidelines and Standards contain architectural and landscape guidelines to integrate the proposed development into the community. These guidelines will ensure that the proposed development in Area 1 does not have the potential to contrast to historic properties in the vicinity of the Project site by restricting heights, using similar materials as surrounding development, and using similar color schemes as the surrounding development. Therefore, indirect operational impacts related to off-site historic architectural resources in Area 1 would be less than significant.

#### Areas 2 and 3

Areas 2 and 3 do not contain permanent structures that would require evaluation of historic resources and, thus, would not be considered historical resources for the purposes of CEQA. Consequently, any development allowable within either of these two areas under the proposed LAX Northside Design Guidelines and Standards would not result in conflict with on-site structures. Therefore, operational impacts related to historic architectural resources in Areas 2 and 3 would not occur.

The proposed LAX Northside Design Guidelines and Standards contain architectural and landscape guidelines to integrate the proposed development into the community. These guidelines will ensure that the proposed development in Areas 3 and 3 does not have the potential to contrast to historic properties in the vicinity of the Project site by restricting heights, using similar materials as surrounding development, and using similar color schemes as the surrounding development. Therefore, indirect operational impacts related to off-site historic architectural resources in Areas 2 and 3 would be less than significant.

# **LAX Northside Airport Support District**

### Areas 4, 5, 7, 8, and 10

Areas 4, 5, 7, 8, and 10 do not contain permanent structures that would require evaluation of historic resources and, thus, would not be considered historical resources for the purposes of CEQA. Consequently, any development allowable within either of these two areas under the proposed LAX Northside Design Guidelines and Standards would not result in conflict with onsite structures. Therefore, operational impacts related to historic architectural resources in Areas 4, 5, 7, 8, and 10 would not occur.

The proposed LAX Northside Design Guidelines and Standards contain architectural and landscape guidelines to integrate the proposed development into the community. These guidelines will ensure that the proposed development in Areas 4, 5, 7, 8, and 10 does not have the potential to contrast to historic properties in the vicinity of the Project site by restricting heights, using similar materials as surrounding development, and using similar color schemes as the surrounding development. Therefore, indirect operational impacts related to off-site historic architectural resources in Areas 4, 5, 7, 8, and 10 would be less than significant.

#### Area 6

Area 6 is mostly vacant, but it contains an electrical substation which does not meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Additionally, the development in Area 6 under the proposed Project (airport support) would be compatible with the existing electrical substation and would not encroach onto its site.

Therefore, operational impacts related to on-site historic architectural resources in Area 6 would not occur.

The proposed LAX Northside Design Guidelines and Standards contain architectural and landscape guidelines to integrate the proposed development into the community. These guidelines will ensure that the proposed development in Area 6 does not have the potential to contrast to historic properties in the vicinity of the Project site by restricting heights, using similar materials as surrounding development, and using similar color schemes as the surrounding development. Therefore, indirect operational impacts related to off-site historic architectural resources in Area 6 would be less than significant.

#### Area 9

Area 9 contains a radar facility which does not meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Additionally, the development in Area 9 under the proposed Project (airport support) would be compatible with the existing radar facility and would not encroach onto its site. Therefore, operational impacts related to on-site historic architectural resources in Area 9 would not occur.

The proposed LAX Northside Design Guidelines and Standards contain architectural and landscape guidelines to integrate the proposed development into the community. These guidelines will ensure that the proposed development in Area 9 does not have the potential to contrast to historic properties in the vicinity of the Project site by restricting heights, using similar materials as surrounding development, and using similar color schemes as the surrounding development. Therefore, indirect operational impacts related to off-site historic architectural resources in Area 9 would be less than significant.

# **Cumulative Impacts**

## **LAX Northside Center District**

The LAX Northside Center District does not contain structures that meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Therefore, the proposed Project would not contribute cumulatively to impacts to on-site historic architectural resources.

The proposed LAX Northside Design Guidelines and Standards for the LAX Northside Center District include guidance to restrict heights, for using similar materials as surrounding development, and for using similar color schemes as the surrounding development. Implementation of these design features would result in less than significant operational impacts related to off-site historic architectural resources. Therefore, the proposed Project would not contribute cumulatively to impacts to off-site historic architectural resources.

### **LAX Northside Campus District**

The LAX Northside Campus District does not contain structures that meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Therefore, the proposed Project would not contribute cumulatively to impacts to on-site historic architectural resources.

The proposed LAX Northside Design Guidelines and Standards for the LAX Northside Campus District include guidance to restrict heights, for using similar materials as surrounding development, and for using similar color schemes as the surrounding development. Implementation of these design features would result in less than significant operational impacts

### 4.4 Cultural Resources

related to off-site historic architectural resources. Therefore, the proposed Project would not contribute cumulatively to impacts to off-site historic architectural resources.

### LAX Northside Airport Support District

The LAX Northside Airport Support District does not contain structures that meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Therefore, the proposed Project would not contribute cumulatively to impacts to on-site historic architectural resources.

The proposed LAX Northside Design Guidelines and Standards for the LAX Northside Airport Support District include guidance to restrict heights, for using similar materials as surrounding development, and for using similar color schemes as the surrounding development. Implementation of these design features would result in less than significant operational impacts related to off-site historic architectural resources. Therefore, the proposed Project would not contribute cumulatively to impacts to off-site historic architectural resources.

# 4.4.3.4.4 <u>Transfer Program</u>

The proposed Project would include flexibility to allow for transfers of floor area within Districts. While transfers of floor area within Districts would be permitted, the maximum proposed Project total of 2,320,000 square feet may not be exceeded. Floor area transfers would not result in new impacts related to paleontological, archaeological, or historic architectural resources. Even if floor area transfers would result in deeper excavation for foundations, the applicable LAX Master Plan EIR/EIS Commitments listed in Section 4.4.3.3.1 would be implemented and would result in less than significant impacts. The applicable design guidelines regarding heights, using similar materials as surrounding development, and using similar color schemes as the surrounding development would also apply resulting in less than significant impacts related to historic architectural resources. In summary, floor area transfers would not alter the conclusions with regard to impacts to cultural resources. Should uses be transferred within the Districts, the resulting impacts would be similar to those evaluated herein.

# 4.4.4 Mitigation Measures

# 4.4.4.1 Paleontological Resources

# 4.4.4.1.1 **Construction**

The Project site does not contain any known fossil deposits. The potential for construction impacts to unknown paleontological resources would be mitigated by the LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, as discussed under Section 4.4.3.3.1. No project-specific mitigation measures related to construction impacts to paleontological resources are required.

# 4.4.4.1.2 **Operations**

The Project site does not contain any known fossil deposits. During operations, excavation would be limited in depth and would require implementation of LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, as discussed under Section 4.4.3.3.1. No project-specific mitigation measures related to operational impacts to paleontological resources are required.

# 4.4.4.1.3 **Cumulative**

The Project site does not contain any known fossil deposits. The proposed Project would have less than significant construction and operational impacts to unknown paleontological resources and would not contribute cumulatively to impacts to paleontological resources. No project-specific mitigation measures related to cumulative impacts to paleontological resources are required.

# 4.4.4.2 Archaeological Resources

# 4.4.4.2.1 Construction

The Project site contains one previously identified archaeological resource in Area 12B that was not found to be eligible as a historic resource. Furthermore, Area 12B would not include construction activities. The rest of the Project site does not contain any known archaeological resources. The potential for impacts to unknown archaeological resources during construction would be mitigated by the LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, as discussed under Section 4.4.3.3.1. No project-specific mitigation measures related to construction impacts to archaeological resources are required.

# 4.4.4.2.2 **Operations**

The Project site contains one previously identified archaeological resource in Area 12B that was not found to be eligible as a historic resource. Furthermore, Area 12B would not be developed under the proposed Project. The rest of the Project site does not contain any known archaeological resources. During operations, excavation would be limited in depth and would require implementation of LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, as discussed under Section 4.4.3.3.1. Therefore, no project-specific mitigation measures related to operational impacts to archaeological resources are required.

# 4.4.4.2.3 <u>Cumulative</u>

The Project site contains one previously identified archaeological resource in Area 12B that was not found to be eligible as a historic resource. Furthermore, Area 12B would not be developed under the proposed Project. The proposed Project would have less than significant construction and operational impacts to unknown archaeological resources and would not contribute cumulatively to impacts to archaeological resources. No project-specific mitigation measures related to cumulative impacts to archaeological resources are required.

### 4.4.4.3 Historic Architectural Resources

# 4.4.4.3.1 Construction

None of the existing structures on the Project site meet the criteria of eligibility for inclusion on the NRHP or CRHR, or to be considered as a historical resource for purposes of CEQA. Furthermore, the construction activities would be restricted to the Project site. The proposed Project would have no construction impacts to on-site or off-site historic architectural resources and no mitigation measures are required.

# 4.4.4.3.2 **Operations**

The proposed Project would have no operational impacts to on-site historic architectural resources. The proposed Project would have less than significant impacts to off-site historic architectural resources. No project-specific mitigation measures related to historic architectural resources are required.

## 4.4.4.3.3 **Cumulative**

The proposed Project would have overall less than significant construction and operational impacts to historic architectural resources and would not contribute cumulatively to impacts to historic architectural resources. No project-specific mitigation measures related to cumulative impacts to historic architectural resources are required.

# 4.4.5 Level Of Significance after Mitigation

# 4.4.5.1 Paleontological Resources

The potential for construction impacts to unknown paleontological resources would be mitigated by the LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, as discussed under Section 4.4.3.3.1. During operations, the proposed Project would have less than significant impacts to paleontological resources. No project-specific mitigation measures related to paleontological resources would be required, and impacts would remain less than significant.

# 4.4.5.2 Archaeological Resources

The potential for construction impacts to unknown archaeological resources would be mitigated by the LAX Master Plan EIS/EIR Commitments HA-1 through HA-7, as discussed under Section 4.4.3.3.1. During operations, the proposed Project would have less than significant impacts to archaeological resources. No project-specific mitigation measures related to archaeological resources would be required, and impacts would remain less than significant.

### 4.4.5.3 Historic Architectural Resources

None of the existing structures on the Project site meet the criteria of eligibility for inclusion on the NRHP or CRHR, or to be considered as a historical resource for purposes of CEQA. The proposed Project would have no construction or operational impacts to on-site historic architectural resources and no construction and less than significant operational impacts to off-site historic architectural resources. No project-specific mitigation measures related to historic architectural resources are required, and impacts would remain less than significant.